

BEATA HEUMAN

SOCIAL, ETHICAL & ENVIRONMENTAL BUSINESS POLICY (THE “POLICY”)

Beata Heuman Limited (“Beata Heuman”) is committed to producing products which are sourced and manufactured in a fair, ethical and environmentally responsible way. Beata Heuman conducts business globally and we aim to ensure that we, our suppliers and our customers behave with respect to human rights and the environment. As we continue to build our sustainability strategy and increase our focus on the environmental impact of our operations, we expect all our suppliers to look to operate in a sustainable way, minimising waste across their network.

We expect our suppliers to conduct their business in accordance with the standards as outlined below:

STANDARDS OF EMPLOYMENT

Standards of employment should be in accordance with the Ethical Trading Initiative (“ETI”) Base Code which specifies that companies must operate as minimum to the following standards:

1. Employment is freely chosen
There is no forced labour and workers are free to leave their employer with reasonable notice.
2. Freedom of association and the right to collective bargaining are respected
Workers 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.
3. Working conditions are safe and hygienic
A safe and hygienic working environment shall be provided with workers to receive regular and recorded health and safety training. Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided. Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
4. Child labour shall not be used
There should be no recruitment of 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 International Labour Organisation (“ILO”) Convention No. 138, the lower will apply. No child or young person under the age of 18 shall work in hazardous conditions.
5. Living wages are paid
Wages and benefits paid for a standard working week meet at a minimum national legal standards or industry benchmark standards, whichever is higher. All workers shall be provided with written and understandable information about their employment conditions with respect to their wages. Deductions from wages as a disciplinary measure shall not be permitted without the expressed permission of the worker concerned.
6. Working hours are not excessive
Working hours must comply with national laws and working hours, excluding overtime, shall be defined by contract and shall not exceed 48 hours per week. Overtime shall be voluntary and working hours may exceed 60 hours in any seven day period (provided it is allowed by national law) only in exceptional circumstances e.g. production peaks. Workers shall be provided with at least one day off in seven or where national law allows, two days in every 14 day period.

BEATA HEUMAN

7. No discrimination is practised
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.
8. Regular employment is provided
To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
9. No harsh or inhumane treatment is allowed
Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

Further information and details of the ETI Base Code and ILO Employment Conventions can be found at <http://www.ethicaltrade.org/>

MODERN SLAVERY ACT 2015

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Beata Heuman has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to ensuring effective systems and controls are in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Each supplier and its representatives shall have in place its own policies to ensure compliance with the Modern Slavery Act 2015 including regular modern slavery risk assessments within their own supply chains and appropriate controls to prevent Modern Slavery. Beata Heuman should be notified immediately if a supplier become aware of any Modern Slavery within its supply chains.

Further information and details of the Modern Slavery Act 2015 can be found at <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

AVOIDING BRIBERY AND CORRUPTION

Bribery and corruption are against the law and the Bribery Act 2010 applies to all Beata Heuman's suppliers including international suppliers and business associates. A supplier must ensure that it or its representatives, does not engage in the following behaviours:

- promising, offering or giving a bribe (financial or otherwise) either directly or through a third party;
- requesting, agreeing to receive or actually receiving a bribe (financial or otherwise) directly or through a third party; or
- bribing with the intention to obtain and/or retain business or an advantage in the conduct of business.

Each supplier shall comply with all applicable laws including (but not limited to) the UK Bribery Act 2010. Each supplier shall have in place its own policies and procedures to ensure compliance with the Bribery Act 2010.

BEATA HEUMAN

HEALTH AND SAFETY MANAGEMENT SYSTEMS

Effective health and safety management systems shall be implemented and maintained by each supplier and its representatives including:

- hazard identification, assessment and control;
- training awareness and competence in health and safety matters;
- performance monitoring and continuous improvement;
- response planning and emergency preparedness; and
- machinery and site vehicles must be dedicated, maintained and used safely with appropriate personal protective equipment.

ENVIRONMENTAL MANAGEMENT SYSTEMS

In order to ensure effective environmental management, each supplier and its representatives shall implement and maintain systems including:

- Pollution - ensure legal compliance, take steps to prevent and minimise pollution and proactively respond to pollution incidents
- Water – maintain responsible use of water resources and adhere to legal requirements regarding water use, disposal and contamination
- Emissions - ensure legal compliance and monitor and maintain emission control equipment
- Energy - minimise use of energy and improve energy efficiencies across the supplier network
- Raw materials – source all raw materials in an environmentally and sustainable way which minimises waste

DOCUMENT VERSION CONTROL

Issue No.	Issue Date	Comment and reason for update/amendments	Author
ISSU E 1	18 May 2021	Published	Beata Heuman