

DUE DILIGENCE POLICY ON MODERN SLAVERY

WILLIAM  
LAMB  
GROUP | SINCE  
1887

## INTRODUCTION:

The International Labour Organisation (ILO) defines slavery as '**all work or service that is extracted from any person under the menace of any penalty and for which said person has not offered him/herself voluntarily**'. It is estimated that globally there could be over 21 million victims of forced labour and that over half are working within the apparel, agriculture, manufacturing, construction, mining and utilities sectors.

There is a very real likelihood that somewhere in any supply chain instances of forced labour or human trafficking could occur. Our supply chains are complex and achieving full visibility and transparency across it will take time and commitment from all stakeholders. There is far too great a risk to our reputation and code of ethics in being complacent, in denial or in taking a strictly limited approach to due diligence.

Suppliers and the employees that work for suppliers are at the heart of our business and only through collaborative and transparent relationships, can we deliver high quality, affordable and sustainable products for our customers. We are committed to changing the way we work with our suppliers, and we want to build partnerships which are positive and for the long-term. It is important that we and our suppliers encourage a culture of honesty and accountability in order to prevent wrong doings and to address them if they occur.

The William Lamb Group Companies (*WLGC*) are totally opposed to any form of slavery within our supply lines. This Due Diligence Policy on Modern Slavery makes clear that wherever we operate, we will always abide by the law and do everything we can to eliminate any forced labour, human trafficking and slavery practices. WLGC also expect the same commitment from our suppliers no matter where they operate to ensure our customers have total trust in the products and services that we provide.

## POLICY:

This policy is intended to provide guidance on what constitutes slavery and human trafficking and a framework for investigation and remediation of any wrong doing.

The aim of this policy is to:

- Outline the standards of behaviour we expect from our suppliers
- Provide guidance on our process of investigating our suppliers
- Provide guidance to employees on highlighting and reporting any wrong doing
- Provide guidance on how any wrong doing will be resolved

We recognise that it can often be difficult for an employee or employees to speak out against or highlight an issue that has occurred but we believe that through a system of allowing such cases to be brought to our attention, developing accountability and having a distinct method of resolving such cases, we can ensure a safer and more positive working

experience for all involved.

## WHAT IS MODERN SLAVERY AND HUMAN TRAFFICKING?

- **Slavery, servitude and forced or compulsory labour** is an offence under the Human Rights Convention and can be defined as the exploitation of person(s) for profit, with little or no pay and no freedom of movement or choice for the person being exploited.
- Persons exploited are often coerced into travelling from their home through the use or threat of violence, deception, financial incentives or other means and then forced to work against their will.

## GUIDELINES:

### 1. Standards of Behaviour

This policy cannot cover every possible situation that may arise but put simply: we expect all our suppliers to hire workers through legitimate means and provide them with meaningful employment with remuneration and working hours that comply with the law in that country.

Workers must have the right to terminate their employment at any time and to come and go freely from their place of employment, overtime worked is voluntary and they are free from any coercion, verbal and physical abuse.

Workers will be entitled to statutory holiday as stipulated in the respective country and in addition will be entitled to at least the minimum legally mandated paid annual leave.

We also expect the management team of the supplier to follow our health and safety guidelines and to ensure their employees work in a safe and comfortable environment.

If you suspect, witness or have experienced any of the following then WLGC ask you to bring this to our attention:

- Are you not being paid for your work?
- Do you work with anyone who is not being paid for their work?
- Is your pay amount what you expect when compared to your hours worked?
- Incorrect wage calculation and unfair deductions from wages
- Withholding yours or other workers identity card or work permit
- Unjust punishment, harassment or abuse
- Not being allowed to take any holiday or being punished or fined if you refuse to work on a statutory public holiday
- Not being allowed to leave the factory site, especially after working hours

- Receiving threats or abusive behaviour if you wish to terminate your employment
- Members of your family receiving threats and abusive behaviour if you wish to terminate your employment
- Do any of your work colleagues complain about harsh treatment from your employer?
- Have you or your work colleagues been moved to other provinces or countries and put to work without your consent?

You must read and understand the WLGC Code of Conduct in the William Lamb Ethical Trading Manual which is displayed in your factory. We expect our suppliers to abide by its principles.

## **2. Guidance on the process of investigation into suppliers**

Modern Slavery and human trafficking could occur at any stage of the supply chain. However, if it does exist it is more likely to be found much further back along the supply route, where it could be difficult to trace where an article or component has been produced, where no written documentary evidence exists for a transaction having occurred.

The main production sites will be the priority for the initial investigations and subsequent visits will look into material and component suppliers.

1. Obtain a complete employee/worker list from which we can select individuals for profile review and interviews.
2. Incomplete worker profiles where Identity card details are missing need to be investigated more thoroughly.
3. Obtain a complete set of working hour and pay records and cross check each worker profile against these; discrepancies must be noted and investigated.
4. Conduct a worker headcount and cross check this against the working hour records. Note any discrepancies in numbers and cross examine worker colleagues so as to verify whether there are additional workers who have not been registered.
5. Interview a random selection of workers to discuss matters such as pay and working conditions, freedom of movement, freedom to collectively bargain, are they aware of the factory operating late into the night, have they heard whether workers from outside have been brought into the factory to work beyond the normal working day, are they aware of any workers who appear depressed or being treated differently to themselves, do they see any instances of workers being physically or verbally abused by the management team. The situation can be judged at the time of interview and further discreet questions may provide evidence that requires investigation.

## **3. Guidance to employees on highlighting and reporting any wrongdoing**

We want you to report any incidences to us as soon as you are able so we can deal with the situation as quickly as possible.

1. In the first instance you can approach any William Lamb Group employee. We have personnel in the factory on a regular basis: Ethical Auditors, QC's, technicians, in addition to foreign personnel who visit the factory from time to time.
2. You can approach any of the above personnel directly and through verbal conversation. The situation will be treated in the strictest confidence.
3. We also engage the services of third party audit companies such as Bureau Veritas, Intertek, SGS and Elevate. Their auditors will often visit the factory and you can approach them if you have a complaint.
4. The William Lamb Group Corporate Compliance Manager will pursue the matter with the relevant factory management with the intention of resolving the situation to a positive outcome.

#### **4. Guidance on how any wrong doing will be resolved**

Any incidents of modern slavery or human trafficking found will be treated as a serious infringement of the Convention on Human rights and also on the William Lamb Group Companies Code of Conduct. We will consider ceasing any business contracts with that supplier or that supplier's subcontractor where we consider that course of action appropriate. However, it is in our interests to resolve situations in a positive way and to ensure that the supplier is engaged in making changes to its business practices that are more sustainable in the long term.

1. In the first instance we will determine if the infringement is a 'one off' isolated case or if there is a pattern of systemic abuse.
2. The management will be asked to explain how and why this infringement has occurred.
3. An interview with the alleged victim or victims will be conducted by William Lamb Group Company representatives.
4. If the situation warrants further investigation we may involve the local police force.
5. In any event we will bring in a Local NGO in order to assist the supplier in formulating more sustainable employment practices.

Note: Such situations require sensitive handling. Suppliers have signed our Code of Conduct and we expect them to abide by its principles at all times. Therefore we expect the following conduct to be adhered to:

- A bribe or payment to keep quiet about an issue is not acceptable
- Dismissal of any employee in response to them highlighting an issue is not acceptable
- Further reprisals and harassment later on are not acceptable
- A written record of the complaint will be kept in a file and the corrective action also recorded.
- The corrective action will be truthful and evidence of it having taken place will be requested.
- If the complaint is regarding an issue that affects worker health, safety and wellbeing then the corrective action must also correspondingly affect the whole factory, not just the particular individual.
- Any corrective action must be written into the supplier policy document or quality manual for future reference.

- The corrective action cannot be a temporary solution but must be sustained.

**'A happy and reliable workforce is key to a brighter, more profitable future'**

We would ask that you, as our supplier, sign this policy and keep one on record, display copies in local language throughout the factory in each production department and in the dormitories and return another copy to the Corporate Compliance Manager at William Lamb Group Limited. By signing this policy you agree with its contents and will abide by its principles.

Signature:..... Print Name:.....

Position Held:.....

Date:.....