

EMPLOYEE GRIEVANCE POLICY

WILLIAM
LAMB
GROUP | SINCE
1887

INTRODUCTION:

William Lamb Group Companies (WLGC) are seriously committed to ensuring the wellbeing and safety of all employees working within its supply base.

Suppliers and the employees that work within them 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 WLGC Code of Conduct makes clear that as a business, wherever we operate, we will always abide by the law. WLGC also expects 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:

We recognise that it can often be difficult for an employee or employees to speak out against or highlight a particular 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.

WLGC want to know about the genuine concerns employees may have rather than waiting for absolute proof. Suspected wrongdoings are:

- Health & Safety i.e. unsafe working conditions
- Legal i.e. fraud or bribery
- Ethical i.e. immoral activities and harsh treatment
- Code of Conduct i.e. wage discrepancies
- Breaking company policies i.e. not abiding by rules and regulations

The aim of this policy is to:

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

This policy has been created for you, our supplier and you the employee to understand in a simple and clear format.

GUIDELINES:

1. Standards of Behaviour

This policy cannot cover every possible situation that may arise but put simply: we expect the management and supervisory staff and their employees to behave in a manner which is respectful towards each other and creates a positive working environment.

We also expect the Management of the Factory to provide a safe and healthy environment where their employees are comfortable and content to go to work in. If you suspect, witness or have experienced any of the following then WLGC would want you to bring this to our attention:

- Criminal activity
- Bribery
- Miscarriages of justice
- Unjust punishment, harassment and abuse
- Incorrect wage calculation and unfair deductions from wages
- Danger to health and safety
- Accidental release of potentially damaging materials into the environment
- Failure to comply with legal or professional obligation or regulatory requirements
- Negligence
- Breach of WLGC's Code of Conduct
- Conduct likely to damage WLGC's reputation
- The deliberate concealment of any of the above matter
- Treatment of workers, illegal personnel procedures
- Inappropriate or non-values behaviour by WLGC representatives or those operating on their behalf

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

2. Guidance to employees on highlighting and reporting any wrong doing

We want you to report any incidences to us as soon as you are able so we can resolve the matter effectively and without leading to further problems.

1. Ask your immediate supervisor for a meeting either post lunch break or evening shift. A work colleague will also need to be present at the meeting as a witness.
2. A record of the meeting will be written down and signed by you, your supervisor and also the witness.
3. If the situation is resolved with a positive outcome and you are satisfied then the matter does not need to be taken any further.

4. If the situation is not resolved then you have the right to request a meeting with senior management either post lunch break or evening shift.
5. At this meeting there will be 2 senior managers, your immediate supervisor, 2 work colleagues, and a union or worker committee representative.
6. The meeting will be recorded and signed by all parties.
7. If the situation is resolved with a positive outcome then the matter does not need to be taken any further.
8. If the situation is not resolved then you have the right to request a meeting with the WLGC representative. The work colleague above will also need to be present as a witness.
9. A written record of the meeting will be made and forwarded to the William Lamb Group Corporate Compliance Manager.
10. The Corporate Compliance Manager will pursue the matter with the relevant factory Management with the intention of resolving the situation to a positive outcome.

3. Guidance on how any wrong doing will be resolved

An employee with a grievance MUST be responded to in a respectful, open and neutral manner. WLGC will not tolerate a response to an employee grievance that is negative and injurious to the wellbeing of that employee. You have signed our Code of Conduct and we expect you to abide by its principles at all times.

- A bribe or payment to keep quiet about an issue is not acceptable
- Dismissal 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

You should consider employee grievances as a reflection of errors in your system of operation and not as an irritation. Therefore, we request that you treat complaints and grievances as an opportunity to improve your systems, policies and workplace environment.

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

We would ask that you now 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. By signing this policy you agree with its contents and will abide by its principles.

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

Position Held:.....

Date:.....