

## Ethical and Code of Standards Policy of the Dormole Group

### Objective

The Dormole Group is committed to ensuring that the suppliers in all countries from whom it buys goods always treat their employees fairly and provide them with safe working conditions, and that none of such employees is subject to slavery nor has been subject to human trafficking.

We are also keen to ensure that our suppliers are committed to minimising their impact on the global and local environment during the manufacturing process.

### Standards

The Dormole Group will seek to ensure that our suppliers meet their social, ethical, and environmental responsibilities in all respects. We also need to be satisfied that our suppliers have taken reasonable measures to ensure that those further down the supply chain also meet such responsibilities. Our particular requirements are:

- 1. Slavery and Human Trafficking** – No employee shall be subject to slavery or have been the victim of human trafficking. Guidance issued by the U.K. Government explains what is meant by the terms “slavery” and “human trafficking” as follows: -
  - a) “Slavery, in accordance with the 1926 Slavery Convention, is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/ she did own the person, which deprives the victim of their freedom.”
  - b) “An offence of human trafficking requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel. This reflects the fact that a victim may be deceived by the promise of a better life or job or may be a child who is influenced to travel by an adult. In addition, the exploitation of the potential victim does not need to have taken place for the offence to be committed. It means that the arranging or facilitating of the movement of the individual was with a view to exploiting them for sexual exploitation or non-sexual exploitation.”
- 2. Child Labour** – All suppliers must hold accurate records of the ages and working hours of all employees who in all cases must not be less than the legal minimum age as required under the relevant national Law.
- 3. Hours of Work** – All suppliers must hold accurate records of the working hours of all employees and such hours must not exceed the legal maximum. All employees must receive a reasonably acceptable number of breaks, days off and holidays.
- 4. Wages** – All wages must meet or exceed legal minimum levels and any deductions must be reasonable, agreed and understood by the employees.
- 5. Employment** – There must be no discrimination in the hiring of employees, who should all be provided with a written contract of employment and disciplinary rules in a language they can understand.
- 6. Abuse of Employees** – There must be no physical or verbal abuse of employees.
- 7. Health and Safety and Hygiene** – All suppliers must employ a Health and Safety Manager who is empowered to deliver a safe working environment, where all risks of injury through exposure to fire or flood, materials, power, equipment, machinery, or hazardous activities have been assessed and minimised. All working conditions should be clean, hygienic, and meet all legal standards and all employees should always have ready access to clean drinking water.
- 8. Environment** – It is important that all suppliers are committed to reducing the impact of the production of their products on the environment. Where they are producing goods that incorporate raw materials in short supply (e.g., wood) it is important that they meet all required standards of care and can produce all necessary certification, if appropriate.

### Process

We or our agents will carry out Ethical and Environmental audits of all major supply partners to ensure compliance with the necessary standards. The Dormole Group will always seek to work with suppliers who are committed to meeting the standards as set out in this Policy.

It is important to the Dormole Group that our suppliers make themselves aware of our Ethical and Code of Standards Policy and ensure that they and those further down the supply chain comply with it at all times.

We shall take appropriate action in the case of any supplier who fails to comply or co-operate fully. Such action will almost inevitably include our ceasing to trade with the supplier.

The Company Secretary of Dormole Limited acts as the Dormole Group Ethical and Code of Standards Compliance Officer and all enquiries or concerns relating to this Policy should be addressed to her.