

Ethical Sourcing Policy

1. Ethical Sourcing Policy Statement

Provide SESS Ltd commits to upholding human rights, fair working conditions and environmental protection.

In accordance with the expectations of our clients, the community, and the requirements of the Law, we endeavour to always operate responsibly within the community and we expect the same from our suppliers.

Maintaining a reputation for the highest legal, moral and ethical standards in our dealings with our clients and other key stakeholders is critical for our ongoing success. This Policy has been developed to complement our core values of: integrity, dependability, accountability, professionalism and respect.

2. EXPECTATIONS

We expect our suppliers to support the ethical standards set out in this Policy with regard to work-place safety, environment, and fair pay and employment conditions.

The Policy sets out the standards that we expect all of our suppliers to comply with.

Our suppliers must commit to complying with the following requirements, many of which are drawn from the Ethical Trading Initiative (ETI) and International Labour Organisation (ILO) Conventions. These requirements represent minimum standards based on the principles of the United Nations Universal Declaration of Human Rights.

2.1 **Bribery and Corruption**

Suppliers shall not engage in acts of bribery and corruption and shall not falsify documents and records.

2.2 Labour Rights

- Employment is freely chosen.
- There is no forced or bonded labour.
- Workers are not required to lodge deposits or their identity papers with their employer and are free to leave their employer after reasonable notice.

2.3 Freedom of association and the right to collective bargaining are respected



- Workers, without distinction, 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.
- Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under Law, the employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

2.4 Working Conditions

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- Adequate steps shall be taken to prevent accidents and injury to health in the working environment.
- Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to clean and drinkable 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.
- Suppliers will ensure that personal protective equipment is available and workers are trained in its use. Safeguards on machinery must meet or exceed local laws.
- Suppliers shall assign responsibility for health and safety to a senior management representative.

2.5 **Living Wage**

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards; whichever is higher.
- In any event wages should always be enough to meet basic needs and to provide some discretionary income



- All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid
- Deductions from wages as a disciplinary measure or any deductions from wages not provided for by Law shall not occur without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

2.6 Working Hours

- Working hours comply with any Law and benchmark industry standards;
 whichever affords greater protection.
- In any event, workers shall not on a regular basis be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 day period on average. Overtime shall be voluntary, shall not be excessive, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

2.7 **Discrimination**

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.

2.8 Regular Employment

- Work performed must be on the basis of a recognised employment relationship established through national law and practice.
- Obligations to employees under labour laws and regulations arising from the
 regular employment relationship shall not be avoided through the use of
 alternate arrangements, or through apprenticeship schemes where there is no
 real intent to impart skills or provide regular employment. -term contracts of
 employment.

2.9 Harsh or Inhumane Treatment



Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

2.10 Entitlement to Work and Immigration

- Only workers with a legal right to work shall be employed or used by the supplier.
- All workers, including employment agency staff must be validated by the supplier for their legal right to work; by reviewing original documentation.

2.11 Sub-Contracting and Home Working

- There shall be no sub-contracting unless previously agreed with Provide.
- Suppliers must have adequate processes in place for properly managing subcontracting to ensure sub-contractors do not abuse, exploit or provide unsafe working conditions for their employees.

3. Policy Compliance

Provide undertakes, through monitoring, verification and reporting, to measure the performance of suppliers in meeting these standards and to encourage and support corrective action wherever necessary. In the event where any supplier is unwilling or unable to demonstrate full compliance with our standards, any agreement between Provide and the supplier will be terminated. The Group Managing Director is responsible and accountable for the implementation of this policy throughout the company's supply chain.

Stuart Turnbull

Managing Director