

## Modern Slavery Act 2015

### AMB0276 Amberon's Supply Chain Code of Standards and Responsibilities

Amberon is strongly committed to conducting its business in a lawful and ethical manner, including engaging with suppliers that are committed to the same principles. We require suppliers in our manufacturing supply chain to comply with our Supplier Code of Conduct<sup>1</sup> ("Supplier Code"), which is detailed below. Amberon also expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered by our Supplier Code. Our products must be manufactured in a manner that meets or exceeds the expectations of Amberon and our customers as reflected in our Supplier Code. Here are some of the key areas we focus on:

- Health and safety in production areas and any living quarters.
- The right to legal wages and benefits.
- Appropriate working hours and overtime pay.
- Prevention of child labour or forced labour.
- Fair and ethical treatment, including non-discrimination.

Our suppliers' business and labour practices must comply with all applicable laws, as well as the requirements and principles of this Supplier Code. Suppliers must comply with the standards of this Supplier Code even when this Supplier Code exceeds the requirements of applicable law.

**Child Labour.** Amberon will not tolerate the use of child labour. Our suppliers must engage workers whose age is the greater of: (i) 15, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed. Furthermore, workers under the age of 18 must not perform hazardous work. Amberon supports the development of legitimate workplace apprenticeship programmes that comply with applicable laws and this Supplier Code.

**Involuntary Labour, Human Trafficking, and Slavery.** Our suppliers must not use forced labour - slave, prison, indentured, bonded, or otherwise. Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker. Suppliers must ensure that each of its staffing or recruiting agencies comply with this Supplier Code and with the more stringent of the applicable laws of the country where work is performed and the worker's home country.

**Safety and Health.** Our suppliers must provide workers with a safe and healthy work environment, and suppliers must, at a minimum, comply with applicable laws regarding working conditions and with the standards below.

*Occupational Safety.* Suppliers must educate workers on safety procedures and also control worker exposure to potential physical safety hazards by implementing physical guards, barriers, and/or engineering and administrative controls. Workers must be informed and receive appropriate education in advance if they will be working with (or otherwise exposed to) hazardous or dangerous conditions or materials. In addition, workers must be given appropriate personal protective equipment and educated and trained on the proper use of such equipment. Suppliers must manage, track, and report occupational injuries and illnesses.

*Physically Demanding Work.* Suppliers must continually identify, evaluate, and control physically demanding tasks to ensure that worker health and safety is not jeopardised.

*Emergency Preparedness and Response.* Suppliers must identify and plan for emergency situations and implement and train their workers on response systems, including emergency reporting, alarm systems, worker notification and evacuation procedures, worker training and drills, first-aid supplies, fire detection and suppression equipment, and unblocked exit facilities.

*Machine Safeguarding.* Suppliers must implement a regular machinery maintenance programme. Production and other machinery must be routinely evaluated for safety hazards.

*Sanitation and Housing.* Workers must be provided with reasonable access to clean toilet facilities and drinking water. If suppliers provide residential facilities for their workers, they must provide clean and safe accommodations.

**Wages & Benefits.** Our suppliers must pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws.. Deductions from wages as a disciplinary measure are not permitted.

**Working Hours.** Except in unusual or emergency situations, (i) suppliers must not require a worker to work more than 60 hours per week, including overtime, and (ii) each worker must be entitled to at least one day off for every seven-day work period. In all circumstances, working hours must not exceed the maximum amount permitted by law.

**Anti-discrimination.** Conditions of working must be based on an individual's ability to do the job, not on personal characteristics or beliefs. Our suppliers must not discriminate on the basis of race, colour, national origin, gender, sexual orientation, religion, disability, age, political opinion, pregnancy, marital or family status, or similar factors in hiring and working practices such as job applications, promotions, job assignments, training, wages, benefits, and termination. Suppliers must not subject workers or applicants to medical tests that could be used in a discriminatory manner.

**Fair Treatment.** All workers must be treated with respect and dignity. Our suppliers must not engage in or permit physical, verbal, or psychological abuse or coercion, including threats of violence, sexual harassment, or unreasonable restrictions on entering or exiting work and residential facilities.

**Immigration Compliance.** Our suppliers may only engage workers who have a legal right to work. If suppliers engage foreign or migrant workers, such workers must be engaged in full compliance with the immigration and labour laws of the host country.

## **Ethical Behaviour**

*No Bribery.* Our suppliers must not offer nor accept bribes or other means of obtaining undue or improper advantages to anyone for any reason, whether in dealings with governments or the private sector.

*Anti-Corruption.* Suppliers must comply with applicable anti-corruption laws, including the United Kingdom Bribery Act, and not offer anything of value, either directly or indirectly, to government officials in order to obtain or retain business. Suppliers must not make illegal payments to government officials themselves or through a third party.

*Whistleblower Protection.* Suppliers must protect worker whistle-blower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers must create a mechanism for workers to submit their grievances anonymously.

**Management Systems.** Suppliers must adopt a management system to ensure compliance with applicable laws and this Supplier Code and to facilitate continual improvement.

*Management Accountability and Responsibility.* Suppliers must have designated representatives responsible for implementing management systems and programmes that oversee compliance with applicable laws as well as this Supplier Code. Senior management must routinely review and assess the quality and efficiency of the management systems and programmes. **Amberon also expects our suppliers to hold their suppliers and subcontractors to the standards and practices covered by this Supplier Code.**

*Risk Management.* Suppliers must establish a process to identify the environmental, health, safety, and ethical risks associated with their operational and labour practices. In addition, management must develop appropriate processes to control identified risks and ensure regulatory compliance.

*Training.* Management must maintain appropriate training programmes for managers and workers to implement the standards in this Supplier Code and to comply with applicable legal requirements.

*Communication and Worker Feedback.* Suppliers must clearly and accurately communicate and educate workers about Amberon's policies, practices, and expectations. Amberon encourages suppliers to partner with us to implement a process to assess workers' understanding of the standards and practices covered by this Supplier Code.

*Documentation and Records.* Suppliers must create, retain, and dispose of business records in full compliance with applicable legal requirements along with appropriate confidentiality to protect privacy.

**Environment.** Our suppliers must comply with applicable environmental laws. Amberon encourages our suppliers to implement systems that are designed to minimise the impact on the environment by the supply chain system, the production process, and the products themselves.

*Environmental Permits and Recordkeeping.* Suppliers must obtain and keep current all required environmental permits, approvals, and registrations and follow applicable operational and reporting requirements.

*Effective Management and Disposal of Hazardous Substances.* Suppliers must effectively identify and manage the safe handling, movement, storage, and disposal of chemicals and other substances that pose a threat to the environment, including providing workers with appropriate training on the safe-handling and disposal of hazardous substances. Suppliers must also monitor and control waste water or solid waste generated from operations before disposing in accordance with applicable laws. In addition, suppliers must characterise, monitor, control, and treat regulated air emissions before discharging in accordance with applicable laws.

**Continuous Improvement.** Amberon welcomes suggestions and feedback from its suppliers to improve Amberon's own operations and processes.

### Revision Status

Revision	Date Issued	Approved by	Signature
1	29/03/2017	T Musson	
2	19/04/2018	T Musson	
3	30/05/2019	T Musson	
4	29/05/2020	T Musson	

On receipt of this document/revision, please destroy all previous and now obsolete copies.

The next review is due: 28<sup>th</sup> May 2021