

ETHICAL POLICY

Reginald Ames Code of Conduct

Introduction

Reginald Ames has created an Ethical Policy in order to ensure that both its organisation and its suppliers conduct their business in accordance with Industry and internationally approved standards of good ethical, employment and environmental practice.

The Ethical Policy is designed to ensure that Reginald Ames, its partners and its suppliers operate within the principles and guidelines as laid down in the Policy.

The procedures contained in this document ensure that Reginald Ames operates best practice in the application of the Policy and ensures that Reginald Ames abides by its core principles.

Code of Practice

Reginald Ames is committed to the manufacture and supply of safe, authentic, legal products that meet or exceed statutory and customer requirements and that it conducts its business according to the standards of good ethical, employment and environmental practice contained in this policy. Reginald Ames expects its suppliers and partners to operate on the same principles.

Specifically, Reginald Ames expects its suppliers (and their sub-contractors) to observe best practice and continuing improvement in the fields set out below, and in any other areas notified by Reginald Ames from time to time.

Scope of Application

This code is to be applied within Reginald Ames and to direct suppliers, who in turn will be required to supervise their suppliers and sub-contractors in the same terms. Reginald Ames accepts that it may be difficult to exert control or influence over small volume or short-term suppliers but will take all reasonable steps to ensure compliance within this part of the supply base.

Where Reginald Ames deals with large company suppliers (over which it cannot reasonably exert control or influence) which operate their own Social Codes of Conduct, Reginald Ames will expect those companies to demonstrate the conformance of their supply base to the company's code. Reginald Ames will not necessarily expect these companies to operate to the Reginald Ames Social Policy. Reginald Ames does not expect companies' codes to apply outside their own scope of reasonable control and influence.

International & National Laws

In applying this code Reginald Ames requires adherence to the specific requirements for social accountability as laid out in the International Standard - Social Accountability 8000 (SA8000) and that the following International Instruments (Conventions and Recommendations) be followed:

- ILO Conventions 29 and 105 & Recommendation 35 (Forced and Bonded Labour)
- ILO Convention 87 (Freedom of Association)
- ILO Convention 98 (Right to Organise and Collective Bargaining)
- ILO Conventions 100 and 111 & Recommendations 90 and 111 (Equal Remuneration for male and female workers for work of equal value; Discrimination in employment and occupation)
- ILO Convention 138 & Recommendation 146 (Minimum Age).
- ILO Convention 135 & Recommendation 143 (Workers' Representatives Convention)
- ILO Convention 155 & Recommendation 164 (Occupational Safety & Health)
- ILO Convention 159 & Recommendation 168 (Vocation Rehabilitation & Employment/Disabled Persons)
- ILO Convention 177 & Recommendation 184 (Home Work).

Companies applying this code are expected to comply with national and international laws as applicable and, where the provisions of law and this Code address the same subject, to apply that provision which affords the greater protection.

Each Reginald Ames direct supplier shall put in place a system to identify all of the relevant ILO Conventions (& Recommendations), international, national and regional laws and any other requirements referenced by this Code. They will be expected to pass this information onto sub-contractors and suppliers as appropriate.

1. Employment of Appropriate Workers

a) Reginald Ames requires that no forced, bonded or involuntary prison labour be used to produce goods, wholly or in part. Workers shall not be required to lodge deposits, or their identity papers, with their employers.

b) No worker shall be employed under the minimum age established by local law, or the age at which compulsory schooling ends in the country, whichever is the greater. In any event, children under fifteen or the minimum working age according to International Labour Organisation (ILO) exemptions (under Convention 138), shall not be recruited or employed.

2. General Employment Practices

Reginald Ames requires that:

a) There is compliance with local legislation regulating employment and working conditions.

b) Employee working hours complies with local legislation and standards and in any event are not regularly more than 48 standard working hours per week. In addition overtime shall not commonly exceed 12 hours per week, shall always be voluntary and shall not be demanded on a regular basis. Each employee is allowed regular rest periods.

c) Part-time or temporary employment complies with local legislation.

d) Employees are paid in accordance with local legislation, specifically including any minimum wage, allowances and benefits. All overtime worked shall be paid at premium rates.

e) All local legislation for sick leave, child care, emergency leave, pregnancy leave, holiday leave and statutory holidays and any similar issues are observed.

3. Working Environment

Reginald Ames believes that products should be manufactured in a safe, hygienic working environment. It therefore requires that the working conditions in places of work comply with the following standards:

a) All national and local health & safety laws and all of the relevant requirements of ILO convention 155. Where the organisation subscribes to other codes of practice or standards on Health & Safety, these shall also be met.

- b) Assigning of a senior management representative to be responsible for health and safety issues.
- c) Written health and safety policies shall apply to all work places.
- d) No employees shall be subjected to unhealthy or unsafe working conditions and all necessary safety equipment (including personal protective equipment) should be provided free of charge. Fire exits shall be adequate and well identified.
- e) Young people under 18 shall not be expected to work at night or under potentially hazardous conditions.
- f) No one shall be employed in potentially hazardous conditions without receiving adequate safety training and supervision. First aid training should be provided to nominated First Aiders. A First Aider should be available at all times.
- g) Provision for all personnel of clean bathrooms, access to potable water, and, if appropriate, sanitary food storage facilities.

4. Respect for the Individual Worker

Reginald Ames requires compliance with management practices which recognise the dignity of the individual and the right to a workplace free of harassment, abuse and corporal punishment.

The company shall not allow behaviour including gestures, language and physical contact that is sexually coercive, threatening or exploitative.

Disciplinary practices shall be clearly set out and communicated to workers. They shall not involve the use of corporal punishment, mental or physical coercion and verbal abuse.

Workers shall have the right of appeal and representation at disciplinary hearings.

5. Environmental Standards

- a) Compliance with all relevant environmental standards and legislation requirements.
- b) There must not be any testing or commissioning of tests of finished products or raw materials on animals. There should be no ozone depleting substances in products
- c) Reginald Ames is committed to sound environmental practices: it will therefore select suppliers dedicated to making continuous efforts to reduce the impact of their operations on the environment.

6. Ethical Standards

Reginald Ames requires all its suppliers and partners to conduct their businesses in an ethical manner. All suppliers & partners must provide Safe, Authentic, Legal goods or services that fulfil statutory requirements. No contract will be entered into with any supplier or partner engaged in bribery, kickbacks or the provision of gifts, favours or services to gain a competitive advantage with Reginald Ames or any third party.

7. Equal Opportunities

Reginald Ames operates an equal opportunities policy. All suppliers must confirm that they do not discriminate in hiring, salary, benefits, advancement, provision of training, termination or retirement (or otherwise interfere with the rights of individuals to observe tenets or practices, or to meet their needs) on the basis of gender, race, religion, caste, age, sexual orientation, disability, union membership, political affiliation, or national or ethnic origin.

8. Freedom of Association & Collective Bargaining

a) Reginald Ames requires all its suppliers to respect the rights of their employees to freedom of association and to organise collective bargaining in a lawful and peaceful manner, in accordance with ILO conventions (87 & 98).

b) Where the right to freedom of association and collective bargaining is restricted under law the supplier shall facilitate parallel means of lawful independent and free association and bargaining for such personnel.

9. Breach of these conditions

a) All suppliers and sub-contractors are expected to achieve compliance with this code within a reasonable timeframe as agreed by Reginald Ames.

b) It is recognised that observance of some provisions of the code may not be immediately realisable in some cases. Some suppliers may not be able to meet all requirements within a short time and in some cases they may be constrained by national law. Reasonable timeframes and the existence of any constraints not controllable by the supplier may be taken into account by Reginald Ames when evaluating compliance. Failure to apply rapid corrective action with respect to certain standards (such as, but not necessarily limited to, the use of forced, bonded or involuntary prison labour, the use of physical abuse or discipline and intimidation) will result in immediate termination of the contract.

c) Where compliance is not achieved, Reginald Ames will no longer continue to place business with this supplier.

Reviewed by: Vince Clarke

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