

trifle*

**SUPPLIER ETHICAL
CODE AND
ANTI-SLAVERY POLICY**

SUPPLIER ETHICAL CODE AND ANTI-SLAVERY POLICY

The Trifle Ltd Supplier Ethical Code sets out the standards of employment and working conditions that are required throughout Trifle's procurement chains. The standards are intended to meet societal and industry expectations, national legislation and International Labour Organisation (ILO) Conventions.

Employers (as defined below) must treat Workers (as defined below) with basic levels of respect and dignity. We use the standards as a tool to assist us in selecting and retaining business partners who follow business practices consistent with our policies and values. As a set of guiding principles, the Trifle Code also helps our Suppliers identify potential problems so that we can work together to address issues of concern as they arise.

The Code applies to all organisations that manufacture or procure goods or services for Trifle Ltd ("Suppliers"), along with Recruitment Agencies, contractors, Sub-Contractors, Labour Providers and Homeworkers who provide labour resources to the supply chain.

Suppliers must comply with all applicable legislation and also with elements of the Code where these go beyond what is required by law.

It is the Supplier's responsibility to ensure that the requirements of the Code are met across all of its manufacturing sites and by all Sub-Contractors, Recruitment Agencies and Labour Providers who supply labour resources to these sites. Suppliers must be able to demonstrate to Trifle that they have carried out sufficient steps to communicate the standards contained within the Code, to monitor levels of compliance and to remediate any areas of non compliance.

The Employer must implement a culture where all Workers feel safe and are respected by their colleagues. The need for a respectful and dignified working environment must be communicated so everyone understands the boundaries of acceptable behaviour. Trifle will support Suppliers and their supply chains who disclose difficulties in meeting the requirements of this Code and seek to work with them to put in place necessary improvements or remediation measures.

TRIFLE LTD SUPPLIER ETHICAL CODE

1. TERMS OF EMPLOYMENT

- 1.1. All Workers' terms of employment must apply with applicable legislation.
- 1.2. As a minimum, there must be agreed terms of employment in place between the Worker and the Employer before the Worker commences work.
- 1.3. Workers must be employed voluntarily and have the freedom to leave their employment.
- 1.4. Workers must be hired and treated based on their ability to carry out their work and their performance. There must not be any form of discrimination or preferential treatment in the hiring, terms of employment, levels of pay, opportunities and treatment of Workers.
- 1.5. The Employer must make every effort possible to provide regular, secure employment. The use of temporary contracts or agency labour must not be used as a means of denying Workers their rights or benefits under employment law.
- 1.6. Apprenticeships and training contracts are encouraged but must be compensated properly and provide adequate levels of training or development. The health, safety and welfare of apprentices employed under such schemes must be safeguarded.
- 1.7. The responsibility for communicating terms of employment to Migrant and Contract Workers must be well- defined in contracts between the Supplier and recruitment Agencies or Labour Providers. Such contracts must include responsibility for essential induction training.

2. FORCED OR COMPULSORY LABOUR

- 2.1. The Employer shall not use forced, bonded or involuntary prison labour. All people working within the supply chain must be;
 - 2.1.1. voluntarily recruited and employed;
 - 2.1.2. employed legally with a valid right to work;
 - 2.1.3. free from any form of coercion or threat;
 - 2.1.4. free of any debt to their Employer or Recruitment Agency;
 - 2.1.5. paid in full, on time and at a level that meets or exceeds the applicable minimum wage;
 - 2.1.6. free to leave their employment, given reasonable notice.
- 2.2. Workers shall be allowed to consult with doctors during working hours.
- 2.3. No deposit or fee shall be retained for securing work or accommodation, tools, training or personal protective equipment (PPE) or for any other reason.
- 2.4. There shall be no unreasonable restrictions on Workers' freedom of movement relating to entering or exiting accommodation or sites of employment.
- 2.5. Employers, Recruitment Agencies and Labour Providers must not deny Workers access to their identity or immigration documents. If these are held for safe keeping, it must be done voluntarily with the Worker being able to re-claim such documents on request.
- 2.6. Workers shall not be required to pay Employers' or agents' recruitment fees or other related fees for their recruitment and must not be bonded through other loans or fees. If any such fees are found to have been paid by Workers, such fees must be repaid to the Worker by the Employer, including international travel costs.

3. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

- 3.1 Workers must be able to communicate openly with their Employer regarding working conditions without fear of reprisal, intimidation or harassment.
- 3.2. Workers must be free to associate or to join Trade Unions or other organisations that represent them. The Employer must not prevent, or discriminate against, Workers who wish to associate or bargain collectively. The decision whether or not to associate should be made solely by the Workers.
- 3.3 Employers must not attempt to influence the election or choice of Worker representatives or seek to influence a Worker representative to act in the management's interest.
- 3.4 The Employer shall adopt an open attitude towards the organizational activities of Trade Unions. There should be open communication channels between Employers and Workers regarding conditions without threat of reprisal, intimidation or harassment.
- 3.5 Where local laws restrict freedom of association and Trade Unions, Employers will allow Workers to form Worker groups/committees, if they so choose. There must not be an unequal representation of management to Workers within these groups/committees.
- 3.6 Where Employers are legally required to consult with Workers, these requirements must be met in full. Formal committees must meet regularly, be adequately attended and operate effectively in the interests of Workers.
- 3.7 Workers must be allowed to stand as Worker representatives on Trade Unions, works councils or other formal representative groups. They must not be restricted, penalised or discriminated against and must have access to management and co-Workers in order to carry out their representative functions.
- 3.8 Where Migrant and/or Contract Workers are employed, they must be adequately represented.
- 3.9 Agreed collective bargaining documentation shall be communicated to Workers and available for the workforce to review.

4. WAGES AND WORKING HOURS

4.1. Wages and benefits

- 4.1.1. Workers' wages for a standard working week should meet or exceed national legal standards or the industry benchmark standards, whichever is higher and be at least sufficient to meet basic needs and provide some discretionary income.
- 4.1.2. Remuneration must comply with agreed contracts, be on time and made in full. Clear written details must be provided to each Worker, showing how the remuneration has been calculated.
- 4.1.3. Wages shall be paid at least monthly.
- 4.1.4. The Employer shall provide to the Workers written and understandable information on the wage calculation including:
 - hours worked or piece rate if appropriate;
 - pay rate;
 - gross pay;
 - overtime pay;
 - itemised deductions; and
 - net pay.
- 4.1.5. Overtime must be offered fairly, paid and managed in accordance with the employment contract and comply with applicable legislation.
- 4.1.6. Workers must be provided with all benefits they are entitled to under national or local law e.g. paid leave, bonus, sick pay and/or social security payment contributions and provided to the Worker in a written and understandable form.
- 4.1.7. Where Workers' basic remuneration is based on their output (piece-rate), the payment must still meet the legal minimum wage. A formal, agreed piece-rate calculation must be in place which ensures that Workers are paid fairly and are able to meet the legal minimum wage, or above, within normal working hours.
- 4.1.8. The Employer shall pay wages directly to the Worker concerned in legal tender, except as maybe otherwise provided by national laws or regulations or collective agreement arbitration award.

4.2. Deductions

- 4.2.1. Legally required deductions that entitle Workers to state benefits must be made and passed on by the Employer to the State.
- 4.2.2. The cost of clothing and protective equipment required to perform work safely must be paid in full by the Employer.
- 4.2.3. Deductions from wages or any other form of financial penalty must not be used as a disciplinary measure.

4.3. Working hours

- 4.3.1. The work schedule shall be documented and communicated to the Workers and include the hours at which work begins and ends, as well as where these duties shall be carried out.
- 4.3.2. Working hours must comply with national laws and collective agreements.
- 4.3.3. Further to clause 4.3.2, regular working hours shall not exceed 48 hours per week, or exceed 60 hours in any 7-day period (except where covered by clause 4.3.4).
- 4.3.4. Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all of the following are met:
 - this is allowed by national law;
 - this is allowed by collective agreement, freely negotiated with the Workers' organisation representing a significant portion of the workforce;
 - appropriate safeguards are taken to protect the Workers' health and safety.
- 4.3.5. Workers shall be provided with at least one day off in every 7-day period or, where allowed by national law, two days off in every 14-day period.
- 4.3.6. Overtime must be offered fairly, contracted voluntarily and paid in accordance with applicable legislation. It must not be used to replace regular employment.
- 4.3.7. Workers must be able to refuse to work overtime without any form of penalty. Workers who refuse overtime must not be denied the opportunity to work overtime in the future.
- 4.3.8. There must be adequate management systems in place to ensure weekly working hours are controlled within the above limits, except in emergency or unusual situations.

- 4.3.9. Every Worker shall be entitled to a period of paid holiday leave each year, which is in line with national law.
- 4.3.10 Every Worker shall be entitled to take reasonable absence from work on the grounds of genuine incapacity through illness, without financial penalty or threat of dismissal. During any such leave the Worker should continue to receive, as a minimum, a reasonable payment to meet basic needs.

5. CHILD LABOUR AND YOUNG WORKERS

5.1. Child Labour

- 5.1.1. A “Child Worker” is defined as someone who has not reached their 15th birthday, or any higher age specified in local law for completing mandatory schooling or beginning full time work.
- 5.1.2. However, in strictly limited circumstances, where local law sets the minimum age at 14 years, under ILO convention 138 in accordance with developing country exceptions, the lower will apply.
- 5.1.3. Child Workers must not be involved at any point in the manufacture or supply of goods to Trifle Ltd.
- 5.1.4. Employers shall develop a system to verify the ages of new Workers including checking original identity documents and cross-referencing with Worker’s photograph.
- 5.1.5. Employers shall develop a system to prevent borrowed identity documents including spot-checking the availability of the identity documents of existing Workers periodically.
- 5.1.6. Copies of age records shall be retained in the workplace.

5.2. Young Workers

- 5.2.1. Where young Workers are employed the Employer must comply with the relevant legal requirements in that region/country. These may include carrying out health and safety risk assessments for young people, restricting working hours and with the relevant contracts and permissions drafted and implemented.

5.3. Preventing Children from Entering Production Areas

Children must not be permitted in production areas at any time, even if they are above the minimum age of employment. This includes the Children of Workers who live in factory accommodation and Children brought to care facilities on site.

Supplier responsibilities

- 5.3.1. Ensure Children cannot enter production areas;
- 5.3.2. All Workers and auxiliary Workers e.g. security guards, cleaners understand that Children cannot enter production areas under any circumstance;
- 5.3.3. Provide safe and adequate supervision of Children living in factory accommodation;
- 5.3.4. Provide safe and adequate supervision of Children brought to the factory whilst their parents/guardians work. Supplier prevention systems must include:
- 5.3.5. Full security and monitoring of all site entrances (when facilities are open and/or accessible);
- 5.3.6. Clear procedures for checking, verifying and recording the identity and age of all visitors;
- 5.3.7. Security personnel who are fully trained on and understand procedures;
- 5.3.8. Enforcement of minimum age requirements within production areas.

6. DISCRIMINATION

- 6.1. Discrimination in any form, based on race, colour, language, nationality, ethnic or social origin, religious belief, political opinion, gender, marital status, disability, property, birth, age, sexual orientation or Trade Union membership shall not be permitted.
- 6.2. The employment practices and policies of the workplace shall afford all Workers equality of treatment.
- 6.3. Decisions or practices which are based on unfair discriminatory grounds, rather than on merit, will not be acceptable.
- 6.4. No job applicant should be unfairly refused employment or offered employment on less favourable terms due to discriminatory practices.

- 6.5. All Workers should have equal access to jobs, training, promotion and transfer and no one should receive less favourable wages, benefits or access to facilities on grounds of discrimination. The Employer shall develop a policy on discrimination of recruiting, wages, benefits, promotion, training, transfer, termination, retirement or access to facilities.
- 6.6. Employers are expected to adopt and adhere to a fair disciplinary procedure. No Worker should face or be threatened with discrimination in any form and no Worker should receive disciplinary action or dismissal on grounds of discrimination. Similarly, no Worker should be unfairly selected for redundancy or lay-off based on discrimination by the Employer.

7. RESPECTFUL TREATMENT OF WORKERS

- 7.1. Corporal punishment, physical, mental or verbal abuse, sexual harassment or other forms of intimidation, harsh, or inhumane treatment shall not be allowed.
- 7.2. The Employer shall protect their Workers from bullying, verbal or physical harassment, victimisation, discrimination or physical abuse in the workplace, whether from management, from their colleagues or from members of the public.
- 7.3. The Employer shall develop written grievance and disciplinary procedures for the workplace and communicate these to the Workers.
- 7.4. A fair disciplinary and grievance procedure shall be established and adhered to in all cases of alleged Worker misconduct or unsatisfactory performance.
- 7.5. All disciplinary and or grievance measures must be recorded.
- 7.6. An appeal channel shall be developed and implemented for Workers facing disciplinary action.
- 7.7. Workers undergoing discipline must have the right to representation by a Trade Union or Worker representative and to a fair appeal.
- 7.8. Workers who raise grievances must not be penalised or intimidated.

8. HEALTH, SAFETY AND SECURITY

8.1. Management systems

8.1.1. The Employer must have adequate management systems to predict hazards and protect the health and safety of all people at their place of work and under the Employer's control, including Homeworkers. This must include a formal and regular assessment of risks, implementation of safe systems of work, the reporting of incidents and a programme of continuous improvement in safety performance.

8.2. Working Conditions

8.2.1. Employers must provide and maintain a safe and healthy work place and working environment.

8.2.2. Workplace

- The workplace must be safe, clean and of sound structure.
- Clean drinking water must be provided and readily accessible.
- The workplace must be well ventilated and illuminated.
- Workers must be protected from extreme temperatures.

8.2.3. Toilets

- Toilets must be clean and free from foul odour and readily accessible.
- Toilets must be equipped with flushing and washing water.
- There must be at least one male room and one female room for every two floors.
- Toilets shall have doors to protect privacy and any windows shall be opaque.

8.3. Fire Safety and Evacuation Procedures

8.3.1. Smoking Policy

- Employers shall develop a policy on smoking and communicate it to all Workers.
- Signs shall be posted where smoking is prohibited.

8.3.2. Evacuation Procedures

- Evacuation plans, including procedure, layout and assembly points, shall be posted in prominent areas in a language that Workers understand.
- Emergency drills shall be conducted at least every 6 months in both the workplace and dormitories (if relevant).
- The procedure shall be documented and communicated to all Workers.

- Employers must develop a written evacuation procedure for emergencies such as fire, chemical spillage, natural disaster and electricity failure.

8.3.3. Walkways, Stairs and Exits

- Fire exits and escape routes shall be adequately signed, well maintained, free from obstruction and easily opened.
- Walkways shall be at least one metre (40inches) wide and pathways shall be free from obstruction and tripping hazards.
- Stairs shall have adequate and secure handrails and are clear from obstruction. • There shall be at least two emergency exits on each floor.
- Floor and roof openings shall be covered or guarded to prevent falling.

8.3.4. Fire Training

- Where applicable, fire training shall be conducted annually to ensure Workers understand how to use firefighting measures. All training must be recorded.

8.3.5. Fire Protection Equipment

- At least one fire extinguisher with adequate extinguishing instruction shall be provided within every 75ft in distance or per 1,000ft².
- Emergency lighting shall be provided in the direction of escape route in case of power failure.
- Fire alarms with or other means shall be provided on all floors to warn staff of evacuation.
- All electrically installed fire alarms shall have a back-up power supply.
- Fire protection equipment shall be immediately accessible and free from obstruction.
- Fire doors shall be fitted and must meet local legislation and/or industry standard specification.
- Fire extinguishers, hydrants, hose reels, sprinklers, smoke/heat detectors, emergency lights and fire alarms shall be inspected monthly for damage and obstruction.
- Fire extinguishers, hydrants, hose reels, sprinklers, smoke/heat detectors, emergency lighting and fire alarms shall be inspected and maintained by qualified personnel annually.

8.4. Medical Programmes

- The Employer shall provide adequate and appropriate first aid facilities for their Workers in case of injury or illness at work.
- To help prevent future accidents, accident procedures should be put in place covering accident reporting and logging, accident investigation and analysis, and learning from accidents to prevent them happening again.
- The workplace shall have at least one qualified first aider on each floor and in each shift, and at least one for every 50 Workers in facilities of under 100 people; for workplaces in excess of 100 Workers, a ratio of one trained first aider for every 100 people or part thereof.
- First aid supplies shall be readily available and managed by designated personnel.
- First aid supplies shall be provided free of charge.
- First aid signs shall be posted with first aid boxes.
- Young persons under eighteen years of age shall not commence employment until a thorough medical examination is conducted to show they are fit for work. Young persons under 18 years of age shall be subject to repeat medical examinations annually.
- Annual medical examinations shall be provided for Workers using respiratory protection equipment as part of their job.
- Where local legislation requires, Employers shall ensure Workers receive medical examinations.
- Annual hearing examinations shall be provided for Workers who are exposed to excessive noise for 8 hours or equivalent.
- Accident reporting channels shall be established and communicated to all workers.

8.5. Chemical Safety

- The Employer should always aim to minimise and eliminate the risks arising from the use of chemicals at work by:
 - Minimising and eliminating use of hazardous substances.
 - Choosing alternatives where elimination is not possible.
 - Choosing technology that eliminates or minimises the risk.
- All chemicals and hazardous substances must be identified and labelled with warning signs in accordance with their chemical properties and legislative requirements. All chemical labelling should be legible and durable, which is easily understandable to the Workers.

- Employers should keep an inventory of chemicals used at the site and make this available to Workers, including but not restricted to: identification of material; approximate volumes; flammability; toxicity; hazard potential for ground water and storage location.
- All chemicals used on site must be fully risk assessed.
- All chemicals and wastes shall be delivered, handled, stored, transported and disposed of in accordance with its properties and legislative requirements.
- Workers exposed to substances hazardous to their health must be provided with such information, instruction and training as is suitable and sufficient for them to know the health risks associated with their exposure to the substances with which they work. They should also be familiar with the precautions necessary for their protection.
- Material Safety Data Sheets (MSDS) must be held for all chemicals and should be made available to Workers at the point of use.
- If a chemical Supplier does not provide the MSDS or the chemicals are not properly labelled, then these chemicals should not be used until the information has been obtained.
- PPE shall be provided for Workers handling chemicals.
- Employers shall develop and implement an emergency plan for handling chemical spills and releases.
- Spill kits or absorbents shall be in place in chemical storage areas.
- Processes using hazardous chemicals shall be well ventilated and personal exposure monitored and kept below regulatory requirements.
- Eye washing equipment should be provided anywhere there is a risk of splashes in the eye.

8.6. Equipment / Machinery

- Employers must ensure that any equipment provided for work is suitable for its intended purpose, maintained in an efficient state, in working order and good repair. Dangerous machinery must be securely guarded.
- Equipment shall be clean and well maintained. All moving parts likely to cause injury shall be effectively guarded. A maintenance programme shall be in place for all safety devices and guarding.
- Where fitted, emergency stop buttons shall be effective and clearly labelled.
- Portable heating appliances shall be positioned safely.

- Hoists, pressure vessels, boilers and forklifts shall be regularly inspected, properly maintained and documented.
- Service lines including steam pipes, compressed air pipes and hot water pipes and tanks shall be regularly inspected and properly maintained.
- Permit-to-work programmes shall be implemented for electricity work, steam pipe work, pressurised pipe work, tank entry, fire protection equipment impairment and welding.
- Forklifts shall be inspected daily when used, findings recorded and operated by authorised personnel only.
- Gas cylinders shall be securely fixed and separated from incompatibles.
- Welding cylinders shall be equipped with flame arrestors and check valves. Local exhaust ventilation systems are regularly cleaned and maintained.

8.7. Electrical Safety

- Only trained staff should be allowed to work with electricity, with all electrical systems being maintained so as to prevent danger at all times. Work should not be carried out on live systems unless there is no alternative.
- All portable electrical equipment shall be tested and checked by a qualified person.
- Fixed wiring shall be tested with records available to confirm testing results.
- Qualified electricians shall maintain electrical equipment and supply.
- All portable electrical equipment shall be grounded and the power connection securely fixed with a socket.
- Electricity mains supply shall be free from obstacles, with warning signs, properly maintained and prevented from un-authorised access.
- No bare wires shall be exposed.
- Only waterproof appliances and supply shall be used outdoors.

8.8. Job Hazard Assessment

- Where risks are not adequately controlled by other means then the Employer must supply suitable Personal Protective Equipment (PPE), free of charge, to the Worker. Examples may be hearing protection, respiratory protection, eye protection and gloves. The Employer must ensure the equipment is kept clean, well maintained and used appropriately.

- Chain gloves shall be provided when using electrical cutters in the cutting process.
- Job hazards shall be assessed, identified and communicated to the Workers.
- Warning signs of hazardous areas such as high voltage, confined space, extreme temperatures and asbestos shall be posted.
- Workers shall be trained to use and maintain PPE.
- Signs shall be posted where PPE is required and use of PPE is mandatory.
- When noise level is likely to be higher than the recommended levels, the Employer shall appoint a qualified person to conduct a noise assessment.
- If Workers are exposed to higher than the recommended levels for 8 hours or equivalent, the Employer shall eliminate noise sources if possible; otherwise ear protection equipment shall be provided and hearing examinations conducted annually.

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WE'RE HERE TO HELP

If you have any further questions about our ethical code and anti-slavery policy, please get in touch.

C O N T A C T U S

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