

Ethical Trading, Human Rights and Labour Standards Policy

Introduction

Europlaz Technologies Ltd has created an Ethical Policy in order to try to ensure that the organisation and its suppliers conduct their business in accordance with industry and internationally approved standards of good ethical employment and environmental practice, including the International Labour Organisation Standards and the Modern Slavery Act 2015.

The Ethical Policy is designed to ensure that the organisation and its partners operate within the principles and guidelines as laid down in the policy.

The procedures contained in this document ensure that the organisation operates best practice in the application of the policy and ensures that the organisation abides by its core principles. The HR Manager has overall responsibility for ensuring that the policy is adhered to.

Policy Statement

Europlaz Technologies Ltd recognises the correlation between poor labour standards and poor-quality goods and services. As such, it makes good business sense for Europlaz Technologie Ltd to target continuous improvement in company and supplier labour standards.

The Ethical Trade Initiative (ETI) Base Code

The Ethical Trade Initiative (ETI) Base Code has been adopted by the organisation to guide our standards. We are committed to doing all we can to ensure that all our employees, colleagues and members of our supply chain have fair and decent treatment and that their human rights are respected and fully met.

<https://www.ethicaltrade.org/resources/eti-base-code>

1. Employment is freely chosen

1.1 There is no forced, bonded, or involuntary prison labour.

1.2 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. Freedom of association and the right to collective bargaining are respected

2.1 Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.

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2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

2.4 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.

3. Working conditions are safe and hygienic

3.1 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 arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.

3.3 Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage shall be provided.

3.4 Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.

3.5 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. Child labour shall not be used

4.1 There shall be no new recruitment of child labour.

4.2 Companies shall develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; "child" and "child labour" being defined in the appendices.

4.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.

4.4 These policies and procedures shall conform to the provisions of the relevant ILO Standards.

5. Living wages are paid

5.1 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.

5.2 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.

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8.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and Practice.

8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No harsh or inhumane treatment is allowed

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

Equal Pay

The organization is committed to equal pay, as set out in the [Equality Act 2010](#), meaning men and women in the same employment performing equal work must receive equal pay. This also applies to all contractual terms.

Payment of Taxes

All relevant taxes will be paid under the applicable National Law and through transparent and ethical conduct of the business the opportunity for tax evasion will be prevented.

Grievances and Individual Conduct

Employees have access to a process to report grievances within the organisation and will be treated fairly and with dignity. Employees have access to a process to report grievances within the organisation and will be treated fairly and with dignity. Detailed policy and procedure on this can be found in the employee handbook which all employees have access to and are shown during their induction.

Antibribery

All laws relating to anti-bribery and corruption will be upheld in whatever country we do business. We are bound by the laws of the UK, including the Bribery Act 2010 regarding our conduct at home and abroad and have a policy in place. Europlaz has detailed policies on both Anti-bribery and Corruption and Gifts and Corporate Hospitality. These can be found in the employee handbook which all employees have access to and are shown during their induction.

Your Responsibilities

- You must ensure that you read, understand and comply with this policy.
- Adherence to the Minimum Standards, and the prevention, detection and reporting of modern slavery in any part of our business or supply chains is the

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5.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours are not excessive

6.1 Working hours must comply with national laws, collective agreements, and the provisions of 6.2 to 6.6 below, whichever affords the greater protection for workers. Sub-clauses 6.2 to 6.6 are based on international labour standards.

6.2 Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week or 8 hours per working day with a minimum of 24hrs rest per week.*

6.3 All overtime shall be voluntary. Overtime shall be used responsibly, considering all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. The maximum number of hours overtime is 12hrs per week. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.

6.4 The total hours worked in any seven-day period shall not exceed 60 hours, except where covered by clause 6.5 below.

6.5 Working hours may exceed 60 hours in any seven-day period only in exceptional circumstances where all the following are met:

- This is allowed by national law;
 - This is allowed by a collective agreement freely negotiated with a workers' organisation representing a significant portion of the workforce.
 - Appropriate safeguards are taken to protect the workers' health and safety.
 - The employer can demonstrate that exceptional circumstances apply such
- as unexpected production peaks, accidents, or emergencies.

6.6 Workers shall be provided with at least one day off in every seven-day period or, where allowed by national law, two days off in every 14-day period.

* International standards recommend the progressive reduction of normal hours of work, when appropriate, to 40 hours per week, without any reduction in workers' wages as hours are reduced.

7. No discrimination is practised

7.1 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.

8. Regular employment is provided

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responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

- You must notify your manager or the Europlaz Technologies Ltd HR Manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- You are encouraged to raise concerns about any deviation from the Minimum Standards or any issue or suspicion of modern slavery in any part of our business or the supply chains of any level of supplier at the earliest possible opportunity.
- If you believe or suspect a breach of this policy has occurred or that it may occur you must notify your Manager or the HR Manager or report it in accordance with our Whistleblowing Policy (PRP-19) as soon as possible.
- If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains breaches the Minimum Standards or constitutes any of the various forms of modern slavery, raise it with your Manager or the HR Manager.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion of a breach of the Minimum Standards or that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

COMMUNICATION AND AWARENESS OF THIS POLICY

Training on this policy, and on the risk our business faces from a breach of the Minimum Standards or from modern slavery in its supply chains, will form part of the induction process for all individuals who work for us, and training will be provided as necessary.

We will seek to communicate our policy as appropriate to suppliers, contractors and business partners at the outset of our business relationship and reinforce as appropriate thereafter.

BREACHES OF THIS POLICY

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

Signed:



Date: 27th Feb 2025

Print Name: Rory O'Keeffe

Position: Commercial Director



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Process Owner (by title):
Sustainability Officer

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