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## **POLICY ON ETHICAL TRADING & LABOUR STANDARDS**

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Photon Energy recognises that our commercial activities have potential to impact on our suppliers and our locality. We therefore take great care selecting the companies who supply us directly with products and services. Our Ethical Trading Policy establishes the standards for suppliers working with us.

Photon Energy participates in supporting the UN Global Compact and therefore we embrace, support and enact, within our sphere of influence, a set of core values in the areas of human rights and labour standards, the environment and anti-corruption.

As a socially responsible business our suppliers, local community and customers have a right to expect:

- Products manufactured and sourced by Photon Energy are produced under working conditions that are hygienic and safe.
- All workers involved in the delivery of services provided by Photon Energy are treated with full consideration to their basic human rights.
- Photon Energy acts in an ethical manner above and beyond basic legal requirements.

### **Supplier's responsibility**

It is the supplier's responsibility to achieve and maintain the standards we have set out in this policy although Photon Energy will support suppliers with continuous improvement where possible and is committed to monitoring social standards in our supply chain.

### **Workforce rights**

The people working for our suppliers are to be treated with respect, and their health, safety and basic human rights must be protected and promoted. Each supplier must strive to comply with our policy and with all relevant local and national laws and regulations, particularly with regard to the following points:

#### **Employment must be freely chosen**

- There is no forced, bonded or involuntary prison 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.

#### **Workers 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.
- 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 other means for independent and free association and bargaining.

### **Working conditions are safe and hygienic**

- A safe and hygienic working environment shall be provided. Adequate steps shall be taken to prevent accidents and injury to health by minimising, so far as is reasonably practicable, the causes of hazards in the working environment.
- Workers shall receive regular and recorded health and safety training.
- Access to clean toilet facilities and 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.
- Responsibility for health and safety will be assigned to a senior management representative.

### **Child labour shall not be used**

- There shall be no new recruitment of child labour.
- Children or persons under 16 are not employed at any time, day or night.
- Children or persons under 18 are not employed full-time.

### **Working hours and remuneration are reasonable and comparable to other companies in our sector and regular employment is provided.**

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards. 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 and other terms of employment before they enter employment.
- Deductions from wages as a disciplinary measure shall not be permitted.
- Working hours shall comply with national laws.
- 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 and shall not be demanded on a regular basis and shall always be compensated at a premium rate.

### **No discrimination is practised**

- 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.

### **No harsh or inhumane treatment is allowed**

- There shall be no physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation in the workplace.

### **Environmental responsibility**

We require all suppliers to meet local or national regulations as a minimum. We actively encourage all suppliers to be as environmentally aware as possible and where requested we will support suppliers to create environmental policy and objectives.

### **Commitment to extending these principles throughout the supply chain**

We expect our suppliers to adopt similar principles in dealing with their own suppliers.

### **Regular assessment**

All suppliers will regularly (at least annually) be requested to provide information or visited by our staff for an assessment to ensure that they are meeting the necessary requirements set by Photon Energy.

Suppliers must apply these principles at all times, and must also be able to demonstrate that they are doing so. We will work with suppliers to support any necessary improvements but we will also take action, which may involve cancelling contracts and ceasing to trade, if suppliers are not prepared to make appropriate changes.

## **UN Global Compact Principles for Labour Standards**

- [Principle 3](#): Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- [Principle 4](#): the elimination of all forms of forced and compulsory labour;
- [Principle 5](#): the effective abolition of child labour; and
- [Principle 6](#): the elimination of discrimination in respect of employment and occupation.

Reviewed: 6<sup>th</sup> February 2019



Jonathan Bates, QMR