

ETHICAL STANDARDS POLICY

ASL recognises the responsibility that we share with suppliers to operate ethically; promoting decent working conditions in our factories and supply chains is part of our strategy to act in a socially responsible manner. In pursuit of our aims, we require that all our suppliers comply with our Ethical Trading Policy, which is based on the Fundamental Conventions of the International Labour Organisation (ILO) and national and international laws.

We expect all our suppliers to have ethical processes and policies in place throughout their supply chain. We will monitor supplier compliance with this policy through audit and/or through a range of other tools to support the risk management, continuous improvement and capacity building of our suppliers, including the requirements for suppliers to provide reasonable information as evidence of compliance with our Ethical Trading Policy.

Specific Supplier Requirements

E.g., Register on SEDEX, conduct ethical audits, auditing of labour providers.

Policy Commitments

In common with ASL, Suppliers to the Company will commit to ensure that:

Employment is freely chosen

- ❖ There is no forced, bonded or involuntary prison labour.
- ❖ Workers are not required to lodge "deposits" or their identity papers and are free to leave in accordance with the terms set out in their contract.

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, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

Working Conditions Are Safe and Hygienic

- ❖ A safe and hygienic working environment will be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps will 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.

- ❖ Workers will receive regular and recorded health and safety training, and such training will be repeated for new or reassigned workers.
- ❖ Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage will be provided.
- ❖ A senior manager will be ultimately responsible for health and safety.

Child Labour

- ❖ There will be no known recruitment of child labour.
- ❖ Where child labour is found, the company will 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 below).
- ❖ Children and young persons under 18 will not be employed at night or in hazardous conditions.
- ❖ Our policy and procedures relating to the employment of children will conform to the provisions of the relevant ILO standards.

Living Wages Are Paid

- ❖ Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
- ❖ All workers are provided with written and understandable information about their employment conditions in respect of wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- ❖ Deductions from wages as a disciplinary measure will not be permitted nor will any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned.

Working Hours Are Not Excessive

- ❖ Working hours comply with national laws and benchmark industry standards, which ever affords greater protection.
- ❖ In any event, workers will not, on a regular basis, be required to work in excess of 48 hours per week and will have at least one day off for every 7-day period on average. Overtime is voluntary and additional payment will be made.

No Discrimination is practiced

- ❖ 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.

Regular Employment

- ❖ To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- ❖ Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship will 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 will any such obligations be avoided through the excessive use of fixed-term contracts of employment.

No Harsh or Inhumane Treatment is allowed

- ❖ Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

Environmental Impact is Managed

- ❖ ASL Ltd will seek to reduce the environmental impact of their business activities. In addition to complying with local laws, steps will be taken to optimise the use of energy and natural resources and reduce the generation of waste. This policy will be reviewed on an annual basis and its implementation is the responsibility of the Managing Director

Definitions: Child - Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age will apply. Young person - Any worker over the age of a child as defined above and under the age of 18.

Child Labour: Any work by a child or young person younger than the age(s) specified in the above definitions which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.