

Edward Bulmer Ltd

Employee & Human Rights Policy

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Policy Statement

Edward Bulmer Ltd (hereafter EBL) is a natural Paint and Interior Design company based in Herefordshire, UK. The core business revolves around Edward Bulmer who is a well-respected interior designer and who regularly features in House and Gardens top 100 Interior Designers. Activities include design of interiors of homes and businesses and supply of environmentally responsible paint products.

Despite a primarily UK based sphere of operation, EBL considers the actions of the company to have global significance. The company aims to conduct its business in a socially and environmentally responsible manner, to contribute positively to the communities in which it operates, to respect the needs of employees, investors, customers, suppliers, regulators and other stakeholders, and to have a net positive impact on the environment.

The core values of EBL recognize the responsibility to respect employees' & human rights and demonstrating that we act accordingly. This policy document is aimed at supporting and guiding management and employees to achieve this goal.

Introduction

In a globalizing world, the role in society of SME's such as EBL is of increasing importance. To ensure that EBL meets its responsibilities in this role, the company has developed core values and strategies:

- To create and protect a safe and responsible working environment for employees in their direct surroundings by respecting and safeguarding employees & their human rights.
- To extend this requirement to the workers involved in the wider supply chain.
- To minimise negative social and environmental impacts of services and products used by and supplied by the company as well as the internal operations of the company itself.

To address the requirements of these core values the following policies have been developed, and these policies form the Corporate Social Responsibility framework for EBL.

- Employees' & Human Rights Policy (this document)
- Environmental Policy (see Appendix)

Human Rights Management

EBL endorses the principles enshrined within the UN Universal Declaration of Human Rights¹ and the Core or Fundamental Conventions of the International Labour Organization (ILO)² based on respect for the dignity of the individual without distinction of any kind. In addition to this EBL recognises and endorses the Modern Slavery Act 2015³ which was established to tackle slavery, servitude and forced labour within the UK, but aims to surpass the requirements of this law by addressing these issues overseas.

EBL will work to ensure all its activities support the human rights and employees' rights in line with the objectives of the international conventions and national laws listed above within the legitimate role of its business. Where an impact on employees' rights falls outside the scope of EBL responsibility, for instance in cases of violations by third parties, the company will provide assistance to its best abilities.

This policy is applicable to all activities carried out by the company and where EBL has management control. In addition to this, EBL has a clear policy to work only with suppliers who respect and enact the clear aims and objectives of the international conventions and national laws listed above. EBL will use its influence to seek to change behaviour of any company in its supply chain found to contravene the principles of both this policy and the international conventions and national laws listed above, with the final sanction of ceasing trading with that company should a resolution not be reached, and where applicable will not hesitate to report any breaking of national or international law to the relevant authority.

A. Implementation

To implement the ethical standards listed below, EBL integrates these standards into all aspects of the company activity. To enable this to happen the company focus is on:

- Training for employees of EBL to raise their awareness of this policy and support in their efforts to respect both their rights and those of fellow employees.
- Training for employees of EBL to monitor the activities of other companies with whom EBL works, and to report any concerns regarding any contravention of human and employees rights.
- Monitoring performance against company benchmarks.
- Facilitating dialogue with stakeholders (including employees) through clear reporting on the employees' & human rights performance of the company.

¹ The Universal Declaration of Human Rights, General Assembly of the United Nations, 10 December 1948, available at www.un.org/en/documents/udhr

² The eight Fundamental Conventions identified by the Governing Body of the ILO www.ilo.org/declaration/info/publications/WCMS_095895/lang-en/index.htm

³ Modern Slavery Act 2015 <http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

B. Grievance procedures

EBL will provide grievance-procedures and inform employees about the existence of such procedures and stimulate the proper use of these procedures, while discretion and protection will be guaranteed to those who make use of these procedures. In case of grievances employees are expected to always follow local procedures first, before making use of other channels.

C. Issues of context

This policy should be viewed as a minimum standard; where local legislation goes beyond the content of this policy, EBL and any suppliers working in that area will be expected to adhere to the local legal obligations.

Standards related to employees' & human rights

1. Non-discrimination

EBL respects the right to non-discrimination. People are employed based on the principle of equal opportunity, without distinction to race, colour, gender, religion, descent or origin. In relation to the appointment or career prospects of employees, EBL will pay attention only to the suitability of the candidate (education, personality, skills, working experience, and other relevant attributes as allowed under local law) and his or her legitimate demands. EBL will take its decisions regarding present and future employees on the basis of objective criteria. EBL respects cultural and individual diversity and promotes inclusiveness. It respects personal beliefs / persuasions of present and future employees.

2. Freedom of Association and the Right to Collective Bargaining

EBL respects the right of its employees to be represented in order to advance their legitimate interests. This right includes the right of internal and/or external employee representatives to be acknowledged as partners in negotiations and consultations subject to local laws. Account shall be taken of the nature of industrial relations in the country and the company concerned. In addition, the needs, size and possibilities of the company concerned shall be taken into consideration. EBL considers being represented by a trade union an employee right, not an obligation (the right to choose not to be represented by a trade union).

3. Forced Labour

EBL will not engage in or support the use of forced or compulsory labour – such as prison labour, debt bondage, trafficking or serfdom. EBL will avoid working with suppliers or employment agencies that are known to be making use of forced or compulsory labour in their operation.

4. Child Labour

EBL respects the rights of the child, including the right to education, the right to rest and play and the right to have the child's basic needs met. EBL will therefore not engage in or support the use of child labour, which means that EBL will not allow children to work within its facilities.

EBL follows the ILO definition⁴ of the minimum age for admission to employment or work. This age shall not be less than the age of completion of compulsory schooling and in any case not be less than 15 years of age, except in some developing countries where it is 14 years of age. In case local laws set a higher age to define what is considered a child, EBL will abide by the local law.

5. Working hours

EBL recognizes the right to rest and leisure and will therefore always comply with local laws, regulations and/or local customs with regard to working hours and overtime. Moreover, in line with the ILO-report⁵ of the committee of experts on the application of conventions and recommendations concerning working hours EBL will generally not require its staff to work in excess of a maximum of 48 hours per week and will provide at least two days off for every seven-day period.

In this way EBL aims to ensure safety in the workplace and to promote a healthy balance between working and home life of its employees.

6. Remuneration

EBL observes the statutory minimum wage set by the government of the country in which it has a local operation. Where this is not sufficient to meet basic needs, EBL strives to compensate employees with remuneration that ensures an adequate standard of living. EBL maintains a remuneration policy that emphasizes the internal equity and external comparability within a defined job market. The key elements within EBL's pay and reward policy are:

- Pay for responsibility
- Pay for performance

7. Health and safety

EBL provides its employees with a safe and hygienic working environment and working conditions. EBL will take appropriate measures to continuously improve safety and health aspects within its facilities, including the provision of personal protective equipment when and where necessary. Working conditions should allow for safe working practices and support the occupational health and well-being of employees. We maintain a policy aimed at continuous improvement of our health and safety performance.

⁴ ILO conventions on Child Labour: ILO Minimum Age Convention, 1973 (No. 138), available at http://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C138

⁵ ILO report of the Committee of Experts on the Application of Conventions and Recommendations (articles 19, 22 and 35 of the Constitution), Report III (Part 1B) Hours of Work, from fixed to flexible?, 2005
<http://www.ilo.org/public/english/standards/relm/ilc/ilc93/pdf/rep-iii-1b.pdf>

Should at some time operation be extended to those countries where basic health care is not sufficiently provided by the government and/or if there is no possibility for employees to arrange for basic health care from local service providers themselves, EBL will provide or ensure (access to) basic health care.

8. Harassment

EBL considers protecting personal dignity and health at the workplace to be one of its core responsibilities as a good employer. One aspect of safeguarding the integrity of each employee is to ensure that harassment in any form does not occur and, if it does occur, to ensure that adequate procedures are readily available to deal with the problem and prevent recurrence.

9. Training and Personal Development

EBL acknowledges the importance of training and personal development of its employees.

- EBL provides for – and bears the costs of - regular training on issues that it finds relevant to the business and/or to the function of the employee. Training and development opportunities for employees will be identified on a regular basis and when considered relevant, training is organised for the employee.
- Personal development (employability) is regarded as a shared responsibility for EBL and its employees. This shared responsibility should be reflected in the contribution both parties are prepared to make in financial terms and/or in terms of time invested in additional education and training. EBL encourages its employees to undertake additional training courses and will support them when additional training is considered necessary. EBL will promote policies aimed at the development of skills relevant for its operation and in line with the talents of its employees.
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10. Non-complicity in Human Rights violations

EBL recognizes that in countries that are politically less stable or where human rights are compromised dilemmas may arise, including whether or how it can continue to source materials from that country with integrity. EBL will act in such a way that none of its operations knowingly contribute to human rights violations by others.

Adopted	Date: 01/01/16
Author	Name: PL
Review	Date: 01/01/19

Appendix

ENVIRONMENTAL POLICY

Policy Statement:

EBL is an advocate of sustainability and will ensure that the environmental impact of its operations is minimal. This will entail,

- setting objectives to improve our environmental performance, including sustainable sourcing,
- the use of ethical supply chains,
- preventing pollution,
- working to recognised environmental standards as applicable.

EBL will regularly review its environmental practices and work with clients and suppliers to improve the environmental performance of all parties. EBL intends that its own behaviour is an exemplar of environmental best practice – to demonstrate tangible proof that an environmentally high-performing company makes for an effective business.

Policy Purpose:

- Ensure that our operations are in alignment with the best sustainability principles.
- Raise awareness of environmental issues and enlist the support of all we work with to improve the company's performance.
- Work with all employees of the company, with clients, with sub-contractors and with suppliers to demonstrate that working sustainably and with environmental sensitivity pays off physically, socially and economically.

Principles:

- Review our environmental policy, our purchasing and general operations to set the future direction of our environmental practice.

- Monitor and seek continuous improvement in our environmental performance (as outlined in our Environmental Guidelines). We aim to:
 - minimise our consumption of resources
 - reduce our energy use
 - purchase products with high environmental performance
 - purchase services from providers with effective environmental programmes
 - support low-energy transport wherever possible for commuting and business travel.
 - Actively promote recycling both internally and amongst customers and suppliers.
 - Minimise waste by evaluating operations and ensuring they are as efficient as possible.

- Comply with all relevant environmental legislation, identify and apply best practice wherever possible and encourage the adoption of similar principles by clients and suppliers.

ENVIRONMENTAL GUIDELINES

Waste Paper

- Print draft and internal documents on re-used paper
- Photocopy and print double-sided
- Collect white and coloured paper, envelopes, leaflets, faxes, newspapers, and magazines for recycling
- Save and re-use envelopes
- Send back unwanted mail and faxes and ask to be removed from mailing lists
- Make own pad of scrap paper rather than use post-it notes
- Use e-mail as much as possible
- Edit document on screen prior to printing
- Circulate documents electronically rather than photocopying them

Metal, Plastic and Glass

- Use recycling containers provided for disposal.
- Use a combination of Council collection and private disposal with high degree of recycling (min 80%).

Printer Cartridges

- Collect and send back for refilling

Electrical Equipment

- Where possible pass unwanted electrical equipment on to other organisations
- Arrange for collection of waste electronic and electrical equipment for hardware recovery where possible

Purchasing Policy

- Purchase paper and stationery items (arch files, wallet envelopes etc) containing post-consumer recycled material when available
- Re-use stationery items as many times as possible
- Buy refilled and refillable cartridges
- Avoid over-packaged goods
- Get our stationery from a company whose environmental policy is compatible with our own policy where possible
- Share office equipment such as staplers rather than buy several
- Use second-hand furniture items and second-hand electrical equipment when possible and where compliant with Health and Safety regulations
- Consider energy efficiency criteria when purchasing new electrical equipment
- Upgrade our computers rather than replace them
- Buy non-hazardous products eg: natural, non-toxic, non-flammable and biodegradable
- Purchase goods from locally based suppliers
- Specify the use of recycled paper and vegetable based inks for all publications
- Specify the use of “Totally Chlorine Free” paper for publicity materials where possible
- Work on office/factory building to increase energy efficiency and switch away from fossil fuels
- Use rechargeable batteries when possible
- Avoid plastic cutlery and disposable items where possible
- Use fair-trade tea, coffee etc
- Use local organic products when possible (milk etc)

Energy Conservation

- Use natural lighting when possible, ie: place work stations near windows
- Turn off lights and all electrical equipment when leaving the office
- Ensure that supplier is sourcing a high percentage of renewable. (EBL uses green tariff supply from Ecotricity).

Transport

- The company is committed to reducing the number of journeys made by motorised transport. However, it is rural based without proper provision of public transport. Walking, cycling or car sharing is encouraged where practicable. Single occupancy car travel will be a last resort.
- When driving, we will obey speed limits and abide by parking restrictions.