

<b>Scope</b>	All Areas
<b>Purpose</b>	To outline to all affected parties the company's Policy on Labour Standards and Ethics that the company adheres to and in turn requires its Suppliers to adhere to as a contractual obligation
<b>Associated Systems</b>	70090 Bribery and Corruption Policy

Toffeln Ltd is an established supplier of work shoes, medical equipment and medical consumables based in the UK. Toffeln seeks to develop long-term business partnerships with reputable suppliers. These partnerships can only be successful if suppliers have a mutual respect for our Ethical Standards.

Our relationships with our suppliers are based on a commitment to compliance with the Modern Slavery Act 2015 and all laws concerning Labour Standards and Human Rights at all times. Toffeln supports the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights as well as the 1998 International Labour Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national law and practice. We believe mutual respect must be extended to everyone in the Supply Chain including employees, sub-contractors and other third parties.

It is an accepted fact that when staff feel 'looked after', this greatly improves worker satisfaction, reduces employee turnover and increases efficiency.

It is recognised that within some countries there are legal and cultural differences from our own, but it is essential that all the factories involved in supplying the company meet the local Labour laws and carry out their business practices with good ethics and protection of their workforce.

**Detailed below are seven areas of risk that we as a company pledge to stand by and require our Suppliers to stand by and also include their Supply Chain in this:**

- **Child Labour** - The supplier employs no children under the age of 15. If national laws or regulations allow children between the ages of 13 and 15 to perform light work, such work is not permitted under any circumstances if it would hinder a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development (reference: ILO Convention 138(7)).
- **Forced labour** - The use of forced labour or involuntary labour of any kind is not acceptable. Companies that withhold passports of staff or have staff that have outstanding Recruitment Fees paid personally to secure their current job cannot be a supplier of Toffeln.

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- **Abusive behaviour** - The use of any form of physical abuse to coerce or punish workers is not acceptable. Additionally, the use of non-physical abuse such as threat of violence, sexual harassment or verbal abuse is also not acceptable
- **Discrimination** – Discrimination against a person or group as a result of race, religion, colour, gender, nationality, age, maternity, marital status or disability is not acceptable.
- **Health and Safety** - Suppliers must ensure that all working premises comply with all applicable laws regarding working conditions, worker health and safety, fire, safety, risk protection, sanitation, electrical and structural safety.
- **Compensation and working hours** - Working Hours / days, wages, over-time pay, and holiday pay must be in compliance with all local laws and must meet the legal minimum wage or a wage that meets local Industry standards, whichever is greater.
- **Improper payments/bribery** - The supplier shall comply with international anti-bribery standards as stated in the United Nations' Global Compact and local anti-corruption and bribery laws including The Bribery Act 2010. In particular, the supplier may not offer services, gifts or benefits to Toffeln employees in order to influence the employee's conduct in representing their company.

Our company is committed to supply relevant resources to implement these standards and due to the high importance of this issue, Toffeln operates a **Labour Standards Assurance Scheme**. This is regularly reviewed by the company Management and audited by an external auditor.

We look for cooperation and understanding from new and existing Suppliers in providing requested information to enable us to successfully maintain this system and ensure compliance. Statistics prove that Modern Slavery can occur anywhere in the world and the UK is no exception.

Anyone wishing to report any violation of these standards can email [whistleblowing@toffeln.com](mailto:whistleblowing@toffeln.com)

Signed for and on behalf of the Company Management:

*Jim Leflaive*

Jim Leflaive, Systems Manager

16<sup>th</sup> February 2023

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