Southwest Seating and Rehab Ltd

LABOUR STANDARDS ASSURANCE SYSTEM POLICY

Southwest Seating and Rehab Ltd supplies the NEO Wheel Base and Matrix Custom Seating mainly throughout the UK. We provide the highest level of service and support to our customers.

The Company acknowledges its obligations towards its customers, employees and the communities in which it works, and this is reflected in its policy in relation to labour standards. Southwest Seating and Rehab Ltd's Management define this policy as relevant to the organisation itself, but also wish to share this information with suppliers, contractors and sub contractors alike with the expectation of them having similar standards relevant to their organisations and their supply chains.

Scope of Policy

Southwest Seating and Rehab Ltd. seeks to implement a policy which is appropriate in nature and scale to the Company and in line with its status, as defined by law, as an SME.

Continual Improvement

The Company commits to periodically review this policy in order to continually improve, taking into consideration changes in legislation, and any other requirements to which the Company subscribes, and in order to ensure the adequacy, suitability and continuing effectiveness of the policy.

Specifically, the policy will be routinely reviewed at the Company's Management Review Meetings and will be integrated into its QMS.

Minimum Labour Standards

The Company has identified the following compelling reasons to establish a comprehensive system of Minimum Labour Standards to guide it in its business operations.

- 1. Business Conduct and Ethics— the Company acknowledges its obligations towards its customers, employees and the communities in which it works arising from its business operations and wishes to work and trade in an ethical fashion. Threat to Security of Supply the Company has identified that labour standards abuses in supply chains can pose a risk to the security of supply. Any supply chain partners perpetrating abuses face legal enforcement action which may damage business and interfere with their ability to continue to supply.
- 2. Adverse Publicity and Damage to the Company's Reputation adverse publicity from the discovery of labour standards abuses in the Company's supply chain presents reputational and structural risks as follows
 - (a) income customers may choose to purchase supplies and services from other providers
 - (b) staff recruitment and retention staff may choose not to work for a Company associated with any labour standards abuses and this may lead to poor morale in the work place and
 - (c) difficulty in recruitment(c) loss of trust both with customers and suppliers and also within the wider community.

3. Reduced Quality Of Goods And Services – the Company recognises that there is commonly a link between poor labour standards and poor quality of goods and services. To this end, it is in the interest of the Company to ensure its suppliers reach minimum labour standards targets at all times.

These Minimum Labour Standards Are:

 Child Labour – the Company does not engage in or support the use of child labour. (According to the International Labour Organisations Worst Forms of Child Labour Convention (1999), all forms of slavery including the sale and trafficking of children for use in compulsory labour, conflict, debt bondage or serfdom shall be prohibited.

Furthermore, the procurement or use of children for illicit activities including prostitution, pornography, drug trafficking or work which by its nature is dangerous to the health, safety and morals of children is also banned).

If the company engages any young workers (eg: on work experience), it will ensure that a suitable risk assessment is carried out and that young persons are not exposed to any hazardous conditions, or in any case work more than 8 hours per day.

- 2. **Forced & Compulsory Labour** the Company shall not engage in or support the use of forced or compulsory labour, or bonded or involuntary prison labour. Employees are free to leave upon reasonable notice.
- 3. Health & Safety the Company shall provide a safe and healthy workplace environment and shall take effective steps to prevent potential accidents and injury to employees' health by minimizing, so far as is reasonably practicable, and in cooperation with its employees, the causes of hazards inherent in the workplace. All employees will receive safety and job specific instructions during the course of their employment with the company. Employees shall have access to clean sanitary facilities and drinking water. Responsibility for implementing the Health & Safety element of this policy is assigned to the Financial & Operations Director.
- 4. **Discrimination** the Company shall not engage in or support any discriminatory practices in hiring, remuneration, access to training, promotion, termination or retirement based on race, national or social origin, caste, religion, gender, sexual orientation, political affiliations, age or other conditions that could give rise to discrimination. The Company has an Equal Opportunities Policy which is shown to all new employees at induction.
- 5. **Disciplinary Practices** the Company shall treat all employees with dignity and respect. The Company shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel. No harsh or inhumane treatment is allowed.
- 6. **Working Hours** the Company shall comply with applicable laws and industry standards on working hours and holiday entitlements. The Company's normal working hours do not exceed 48 hours per week, overtime hours do not exceed 12 hours per week, and workers will have a minimum of 24 hours of unbroken rest per week. The Company ensures all employees have the legal right to be employed in the UK.

- 7. **Remuneration** the Company shall comply with national laws and regulations with regard to wages and benefits. All work related activities are carried out on the basis of a recognised employment relationship established according to national law and practice. SWS will always pay over the national minimum wage and will endeavour to exceed the National Living wage.
- 8. Freedom Of Association & The Right To Collective Bargaining All workers have the right to join or form trade unions of their own choosing, and are able to bargain collectively (International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, 1998). The employer must recognise the principals and objectives of trade unions and their organisational activities. Worker's representatives are not to be discriminated against and must be permitted access to perform their representative roles in the workplace. Under legally restricted circumstances of collective bargaining and freedom of association the employer is to facilitate, not hinder the development of parallel means for independent and free association and negotiation.
- 9. **Work Place Conditions**: SWS will provide its employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Consistent with these obligations, SWS will have and will implement effective programs that encompass things such as life safety, incident investigation, chemical safety, ergonomics, and will provide safe standards of health and safety in any housing and transportation provided for our employees by the company.
- 10. **Grievances:** SWS will investigate and deal with any such event discretely, appropriately and fairly.
- 11. **Equal Pay**: We believe as part of that principle that all staff, regardless of age, disability, gender, race, religion or belief, sexual orientation, or any other irrelevant distinction should receive equal pay for the same or broadly similar work, for work rated as equivalent and work of equal value.

The Company also commits to:

- Compliance with relevant legal and other requirements to which it subscribes
- Ensure that all its key contractors, sub-contractors and suppliers are aware of this
 policy
- Make available sufficient resources for the implementation of this policy.

The Company will make this policy publicly available via it's web site, and the policy will also be communicated to SWS employees in the first instance, and also to all contractors, subcontractors and suppliers.

Reviewed: 01/04/2021

S Doble, General Manager, Southwest Seating and Rehab Ltd