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Dowlis Corporate Solutions: Supplier Corporate Social Responsibility Code

Dowlis' chosen suppliers are expected to demonstrate that they maintain effective policies and procedures for the management of employee relations within their organisations and their supply chain.

Employee relations' issues include many factors which are described below. This code sets out the minimum corporate social responsibility standards Dowlis expects its chosen suppliers to achieve and maintain.

Management Systems and Code Implementation

- 1.1 Dowlis' suppliers are expected to implement and maintain systems for delivering compliance to this Code.
- 1.2 Our suppliers must appoint a senior member of management who shall be responsible for compliance with the Code.
- 1.3 Our suppliers must communicate this Code to all employees and to their suppliers.
- 1.4 Our suppliers must extend the principles of this code through their supply chain.

Forced Labour

- 2.1 Dowlis will not tolerate any forced, bonded or involuntary prison labour.
- 2.2 Workers must not be required to lodge "deposits" or their identity papers with their employer and be free to leave their employer after reasonable notice.

Freedom of Association

- 3.1 Freedom of association and the right to collective bargaining must be respected. Therefore, without distinction, workers should have the right to join or form trade unions of their own choosing and to bargain collectively.
- 3.2 Dowlis expects our suppliers to adopt an open attitude towards the activities of trade unions and their organisational activities.
- 3.3 Workers' representatives are not to be discriminated against and are to have access to carry out their representative functions in the workplace.
- 3.4 Where the right to freedom of association and collective bargaining is restricted under law, we request that our suppliers facilitate,

and do not hinder, the development of parallel means for independent and free association and bargaining.

Health and Safety

- 4.1 Working conditions must be safe and hygienic. Dowlis' suppliers must ensure that a safe and hygienic working environment is provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising the causes of hazards inherent in the working environment.
- 4.2 Workers must receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 4.3 Access to clean toilet facilities and to portable water, and, if appropriate, sanitary facilities for food storage must be provided.
- 4.4 Accommodation, where provided, must be clean, safe, and meet the basic needs of the workers.
- 4.5 The company observing the code must assign responsibility for health and safety to a senior management representative.

Child Labour and Young Workers

- 5.1 Dowlis does not tolerate child labour in any part of our supply chain.

Rates of Pay

- 6.1 In every part of our supply chain wages and benefits paid for a standard working week must meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages must always be enough to meet basic needs and to provide some discretionary income.
- 6.2 It is the responsibility of our suppliers to ensure that all of their employees are provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 6.3 Deductions from wages as a disciplinary measure must not be permitted nor shall any deductions from wages not provided for by

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national law be permitted without the expressed permission of the worker concerned. All disciplinary measures must be recorded.

Working Hours

- 7.1 Dowlis' suppliers must check that the working hours in their factories are not excessive.
- 7.2 Working hours need to comply with national laws and benchmark industry standards, whichever affords the greater protection to the employee.
- 7.3 In any event, workers must not on a regular basis be required to work in excess of 48 hours per week and must be provided with at least one day off for every 7 day period on average. Overtime must be voluntary, must not exceed 12 hours per week, not be demanded on a regular basis and always be compensated at a premium rate.

Discrimination

- 8.1 Dowlis will not tolerate discrimination.
- 8.2 There must be 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

- 9.1 It is the responsibility of our suppliers to establish recognised relationships with their employees that must be based upon national law and practice.
- 9.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship must 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 must any such obligations be avoided through the excessive use of fixed-term contracts of employment.
- 9.3 There must be no sub-contracting unless previously agreed with the company introduced by Dowlis.
- 9.4 Where agreed, systems and processes must be in place to manage sub-contracting, homeworking and external processing.

Discipline

- 10.1 Dowlis believes that discipline must be warranted and no harsh or inhumane treatment will be tolerated.
- 10.2 Our suppliers accept that physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation will not be tolerated.

Entitlement to Work, Migrant and Agency Labour

- 11.1 Dowlis' chosen suppliers undertake to ensure the legality of their employees to work. All workers including employment agency staff, must be validated by the supplier for their legal right to work by reviewing original documentation.
- 11.2 Any employment agencies used by our suppliers must only supply workers registered with them.
- 11.3 Our suppliers must implement processes to enable adequate control over agencies with regards the above points and related legislation.

Environment

- 12.1 Dowlis must be notified of any breaches of environmental legislation as soon as they occur.
- 12.2 Suppliers must seek to make continuous improvements in their environmental performance and, as a minimum, comply with the requirements of local and international laws and regulations.

Important

The provisions of this code constitute minimum and not maximum standards, and this code should not be used to prevent companies from exceeding these standards. Companies applying this code are expected to comply with national and other applicable law and, where the provisions of law and this code address the same subject, to apply that provision which affords the greater protection.