



## **Code of Conduct**

Downland Bedding Company expects its employees, suppliers, manufacturers and sub-contractors to conduct business ethically in compliance with the law, with integrity, transparency and to adhere to the following principles.

The UN's Universal Declaration of Human Rights, the conventions of the International Labour Organisation (ILO) as well as country-specific statutes and official requirements are to be respected and serve to inform and interpret the following principles

Violation of this code of conduct may provide Downland Bedding with a reason to terminate the business relationship.

### **1 Forced labour (ILO convention C029:1930 & C105: 1957)**

Any form of forced labour is prohibited. The use of physical punishments as well as of mental or physical duress and verbal abuses are prohibited.

### **2 Prohibition of Child labour (ILO convention C138:1973, C142:1975, C182:1999)**

The exploitation of child under the age of 15 and their employment is prohibited. The rights of young employees are to be protected. If children are encountered at work, the supplier shall document the steps it takes to provide relief for the children which enables them to attend school.

### **3. Provide fair wages, working hours and benefits (ILO convention C01:1919 C014:1921)**

Suppliers shall ensure working hours, wages and benefits are consistent with laws and industry standards including those pertaining to minimum wages, overtime, other elements of compensation and legally mandated benefits.

### **4. Provide a workplace free from discrimination (ILO Convention C110:1958, C111:1958, C159:1983)**

All employees have the right to equal treatment and the same opportunities. Any discrimination on the grounds of gender, age, religion, race, cast, social background, disability, ethnic origin, nationality, gender orientation shall be prohibited.

### **5. Respect employees' right to freedom of association and collective bargaining consistent with local laws. (ILO C087:1948, C098:1949, C135:1971, C154:1981)**

The right of the employees to establish organisations of their choice, to join them and to conduct collective negotiations must be respected. In situations where the rights to freedom of association and collective negotiations are limited by law, other opportunities must be granted for the independent and free union of the employees for collective negotiation.

**6 Provide safe and healthy working conditions (ILO C155:1981, R164:1981, R190; 1999)**

The employer must guarantee health and safety in the workplace. Rules and procedures to ensure health and safety must be introduced and communicated to the employees in order to prevent accidents and injuries during work.

**7. Environment and Sustainability**

Responsibility for the protection of human life and the environment is to be ensured by means of preventative actions and the application of environment friendly measures. Environment awareness is to be promoted. Procedures and standards for resource management, reduced emissions and waste management must correspond to or exceed the statutory minimums and are to be continually improved.

The social standard defined in this code of conduct are to be accepted by the management of the supplier and integrated into company policy. Employees are to be informed of the content of this code or any relevant law affecting them in a manner which is accessible to them. Supplier shall keep adequate records to substantiate compliance with this code and national /international statutes. There may be instances suppliers will be asked to conduct a third party audit to show compliance with this code of conduct.

All supplier provided information and this policy will be reviewed on a quarterly basis. The review meeting will be attended by

- Fraser Smith : Managing Director
- Joanne McCormack : Sales Manager
- Marc Boland : Operations Director /Responsible person for compliance
- Suzanne Benjelloun : Production Manager
- Stephen Ward : Commercial Director
- Shaji Mathew : Technical & Compliance Officer

In addition to reviewing the existing information, any targets will be set and assessed whether the required actions are being taken and aiming for continued understanding and monitoring of all labour standards. Downland bedding also have a commitment to continuous improvement.

Sign: *Fraser Smith*  
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Date: 17/05/2023

Position: Managing Director

