

## Ethical Manufacturing/Sub-Contracting Policy

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This Ethical Sourcing Policy applies to all facilities that produce goods or provide services for BMA Group Limited (BMA) or any of its subsidiaries, business units, or agents. BMA is committed to sourcing products and services in an ethical and responsible manner, and considering the welfare of workers, health and safety and potential environmental impacts. The BMA Ethical Sourcing Policy is based primarily on Ethical Trade Initiative Base Code (ETI).

### 1. Policy Requirements

- 1.1. All suppliers are required to agree to the principles in the BMA Ethical Sourcing Policy and as set out in their Trading Agreement with BMA.
- 1.2. Manufacturing Facilities must complete a self-assessment, as required and BMA may, at its discretion, require an independent audit of a supplier's compliance with this policy.

### 2. Legal Requirements

Manufacturing Facilities must fully comply with all local laws and regulations regarding labour, health, safety and the environment. Manufacturing Facilities must also fully comply with the legal requirements of the countries in which they operate in addition to all elements of this Ethical Sourcing Policy.

### 3. Child Labour

- 3.1. Manufacturing Facilities must not use child labour. Child labour is defined as work that deprives children of their childhood, the opportunity to attend school and fulfil their potential and that is harmful to their physical, moral and mental development.
- 3.2. Manufacturing Facilities must be able to verify the age of all employees to ensure no child labour is used and shall comply with the minimum legal working age in the country in question or by the ETI clause 4, whichever is higher.
- 3.3. Manufacturing Facilities must accept the principles of remediation of child and underage workers, and where such labour is discovered, suppliers must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.
- 3.4. Children and young persons under the age of 18 must not engage in hazardous work

### 4. Modern Slavery

- 4.1. The Manufacturing Facilities will comply with all applicable anti-slavery laws and must not engage in any modern slavery practice, including using forced, bonded or involuntary labour or human trafficking.
- 4.2. The Manufacturing Facilities must not be convicted or investigated in relation to any practice that amounts to modern slavery practice or be publicly named by any organisation alleging modern slavery practices.
- 4.3. Employment is freely chosen, workers can leave their employment after reasonable notice, freedom of movement is respected, and workers are not required to lodge deposits or identity papers with suppliers.

## **5. Harassment and Harsh or Inhumane Treatment**

Workers shall be treated with dignity and respect. Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

## **6. Business Integrity**

6.1. Suppliers must engage professional business ethics in all dealings.

6.2. Bribes, favours, benefits or other similar unlawful or improper payments, in cash or in kind, are strictly prohibited, whether given to obtain business or otherwise.

6.3. Manufacturing Facilities must notify the BMA immediately should any form of conflict of interest becomes apparent.

## **7. Wages and Benefits**

7.1. Wages and benefits paid for a standard working week must meet as a minimum national or industry standards, whichever is the higher. In any event, wages should always be enough to meet basic needs and to provide some discretionary income.

7.2. All workers must be 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 are paid.

7.3. Deductions from wages may only occur with the express written permission of the worker concerned.

7.4. Deductions from wages for disciplinary measure are not permitted.

7.5. Wages are to be paid in a timely manner.

## **8. Working Hours**

8.1. Including any overtime, workers must not work above the maximum hours per week or per month as stipulated by local laws, or where local laws do not exist, a total of 60 hours in any 7 day period.

8.2. Workers must have at least one day off in 7 days or two days off in every 14 days.

8.3. Overtime must be voluntary, not be excessive or demanded on a regular basis and must be compensated as prescribed by local laws.

8.4. Record keeping on hours worked must be accurate, complete and transparent at all times.

## **9. Freedom of Association**

9.1. Manufacturing Facilities acknowledge that workers have a right to freedom of association and to bargain collectively.

## **10. Safe Working Conditions**

10.1. Plant and systems of work that are safe and without risk to health will be provided; including evidence of safe fire, structural and electrical safety, plant, or systems of work, including adequate, unlocked, accessible, and clearly marked emergency exits.

10.2. Manufacturing Facilities will provide workers with a safe and clean working environment, taking into consideration the prevailing knowledge of the industry and of any specific hazards.

10.3. Workers must receive adequate and regular training to perform their jobs in a safe manner.

10.4. Personal Protective Equipment (PPE) must be supplied and worn where required. Workers must be trained in the use of PPE.

10.5. Safeguards on machinery must meet or exceed local laws.

10.6. Where suppliers provide worker accommodation, it must be clean, safe and meet the basic needs of workers.

10.7. Workers must have access to clean toilet facilities, clean drinking water and where appropriate sanitary facilities for food storage and preparation.

10.8. Workers have the right to refuse to work that is unsafe.

## **11. Discrimination**

11.1. There is 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.

11.2. Manufacturing Facilities must ensure that they provide an environment where their employees can work without distress or interference caused by harassment or any other inappropriate workplace behaviour.

## **12. Regular Employment**

12.1. To every extent possible, work performed must be on the basis of recognised employment relationship established through national law and practice.

12.2. Employees who have a regular employment relationship with their employer are afforded a number of obligations from their employer relating to labour and social security laws and regulations. These obligations shall not be avoided through the use of labour-only contracting, sub-contracting, home-working arrangements, fixed term contracts or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment.

## **13. Environment**

13.1. Suppliers must comply with local and national environmental laws and regulations, ensuring no impact on the health of the local environment and community.

13.2. Suppliers must use reasonable endeavours to comply with international standards on environmental protection.

13.3. For paper and timber products (for resale, excluding packaging materials), suppliers must provide Forest Stewardship Council (FSC), Programme for Endorsement of Forest Certification Scheme (PEFC), or otherwise agreed chain of custody documentation for the source of paper and / or timber used in products for BMA.

13.4. Conflict Materials – BMA supports compliance with the United States (US) Dodd Frank conflict minerals legislation and is committed to responsible sourcing of these minerals, namely tin, tantalum, tungsten and gold. Suppliers are expected to undergo due diligence within their supply chain if these minerals are used in the manufacture of BMA products from both source of supply and smelting. Suppliers will not be approved if they cannot demonstrate source of supply and/or are sourcing raw materials originating from the relevant conflict countries.

13.5. Asbestos – All suppliers warrant that such products are free from asbestos (in other words, that such products have no asbestos content).

13.6. Restriction and Banned Substances – BMA requires suppliers to comply with European Union (EU) Registration, Evaluation, Authorisation and Restriction of Chemical Substances (REACH) regulations set for restricted and banned substances of high/very high concern to protect our customers wearing our products and those making our products for us.