



## **THINKING WORKS Suppliers Code of Conduct**

### Business Ethics and Compliance

## **INTRODUCTION**

Thinking Works is committed to conducting business in a manner that reflects our ethical values. We outline our social and environmental standards below, and we aim to support, encourage, educate and, where necessary, mandate our suppliers to comply with these requirements.

We cooperate closely with our suppliers and business partners throughout this due diligence process. Accordingly, we have prepared this Code of Conduct to illustrate what we expect of our suppliers and business partners. Our Code of Conduct (Code) covers human rights, labour rights, environmental impacts and anti-corruption.

### **Frameworks and Standards that inform Supply Chain Conditions**

Thinking Works' human rights and environmental policies and procedures draw upon the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UN Global Compact, and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

## **LABOUR AND HUMAN RIGHTS**

### **Prevention of child labour**

Our supplier will comply with International Labour Organization (ILO) Convention 138 by employing workers who are at least 15 years of age, or of the minimum age set by relevant local law. Young workers are not to perform any work that is mentally, physically, socially or morally harmful or interferes with their opportunity to attend school.

This also extends to the worst forms of child labour (ILO) Convention 182. Young workers shall not work in confined spaces, or participate in excessive manual handling, excessive heavy lifting, operating dangerous machinery or equipment, exposure to hazardous substances, extreme temperature or noise levels, or working excessive hours. Young workers include the ages of 15-18 years of age.

### **Modern slavery, forced or bonded labour**

Our suppliers shall not use any type of forced labour, which means any work or service performed involuntarily under threat of punishment or other penalties, such as prison, indentured or bonded labour. In addition, workers should not be restricted in their movement through the control of identity papers, holding money deposits or any other action to prevent workers from terminating their employment.

### **Recruitment fees**

Our suppliers will ensure that their workers are not required to pay a recruitment fee (or similar) or are required to repay fees to an agent or broker to obtain employment.

### **Wages, benefits and working hours**

Wages and benefits shall at least meet minimum national legal standards or ideally, industry benchmarks. All workers should be provided with written and easy to understand employment terms, outlining their

wage, working conditions and method of payment. There shall be no withholding of workers' wages unless authorized by law.

Workers shall not work excessive hours and shall have the option of at least one day off every week. All overtime must be voluntary (workers are free to refuse overtime). Weekly working hours should be within government labour laws. Workers should receive overtime payment for all hours worked over and above normal working hours. We expect record-keeping to be accurate and transparent at all times.

### **Non-Discrimination**

All conditions of employment must be based on an individual's ability to do the job, not based on gender, material status, race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

### **Harassment and Abuse**

Physical abuse or harassment can take many forms, including physical, sexual, verbal behavior that creates an offensive, hostile or intimidating environment. Harassment and abuse will not be sanctioned in any form.

### **Discipline and Harassment Grievances**

Discipline and grievance processes and procedures must be in place to ensure all workers are treated with fairness and are able to bring matters of concern in the workplace to the attention of management without fear of reprisal or disadvantage.

### **Freedom of Association and Collective Bargaining**

All workers shall have the opportunity to join or form trade unions of their choosing and to bargain collectively. The supplier shall not interfere with or obstruct the formation of unions or collective bargaining. Workers' representatives shall not be discriminated against and shall have freedom to carry out their representative functions in the workplace.

### **Workers Health and Safety**

A safe and hygienic working environment shall be provided, along with access to clean toilet facilities and potable drinking water.

Health and safety risks should be identified, evaluated and managed and adequate steps taken to prevent accidents and injury. Workers shall receive regular, documented health and safety training, and such training shall be repeated for new or reassigned workers. Work-related personal protective equipment (PPE) shall be provided and maintained, along with instructions on proper use.

Suppliers are required to ensure they have identified potential emergency situations, which include (but are not limited to) factory fires. The supplier must ensure they have emergency procedures. They must conduct regular fire drills, ensure the site has adequate emergency equipment, and ensure staff receive emergency and fire safety training.

The supplier shall assign responsibility for health and safety to a senior management representative and document policies and procedures.

### **ANTI-CORRUPTION AND BRIBERY**

Corruption in any form is not accepted, including bribery, extortion, kickbacks, and improper private or professional benefits to customers, agents, contractors, suppliers, or employees of any party or government official.

### **ENVIRONMENT**

Measures to minimise adverse impacts on human health and the environment shall be taken throughout the supply chain. This includes minimising pollution, promoting the use of efficient and sustainable resources, including energy, water and waste (recycling), and minimising greenhouse gas emissions in production and transport. Compliance to national and international environmental legislation and regulation shall be implemented.

## LEGAL REQUIREMENTS

Thinking Works expects your company will ensure its operations are compliant with local, national and international laws governing human rights, labour rights, environmental protection, anti-corruption and bribery.

### Compliance with our Code of Conduct

Thinking Works will monitor compliance with this Code and will visit factories to ensure the requirements of this code are being adhered to. Any non-conformances to our Code will be addressed with the supplier for follow up and corrective action. We request that our supplier cooperates with this process. Where the supplier does not demonstrate a willingness to comply, Thinking Works may look for alternative suppliers.

### Supply chain due diligence

There is an expectation that our suppliers will conduct similar due diligence exercises throughout their supply chain, including issuing this Supplier Code of Conduct (or similar) to their suppliers.

### Management systems

Management systems are key to the successful implementation of a code of conduct. Thinking Works emphasises the importance of suppliers having systems in place that support implementation.

Thinking Works' expectations in this regard are summed up in the following measures:

- The supplier should make a management representative responsible for the implementation of the Code of Conduct in the supplier's business.
- The supplier must make the Code known in all relevant parts of its organisation.
- The supplier must obtain Thinking Works' consent before outsourcing production or parts of production to a sub-supplier/contractor or other factory
- The supplier must be able to give an account of where the goods it orders are produced.

## CONFIDENTIALITY

Our business depends on a free flow of information and we trust our suppliers to treat all Thinking Works Confidential Information, confidentially. It should not be shared with non-relevant parties or used for applications other than those required for Thinking Works.

"Confidential Information' means all and any information concerning Thinking Works' business and finances, commercial interests including and without limitation, product development and future plans, technical drawings and procedures, financial information, intellectual property, its customer, client and supplier lists, including details of prospective clients and its products and services."

**DATE: 2 August 2021**

**SUPPLIER COMPANY NAME: E.M.UTICK**

**DIRECTOR NAME: JOHN BRYANT**

**DIRECTOR SIGNATURE:**

