

MONICA VINADER



EQUAL OPPORTUNITIES AND HUMAN RIGHTS POLICY



1. Purpose

We are committed to protecting and respecting human rights in the workplace as well as ensuring a sustainable business environment. As part of that promise, this policy has been developed in order to ensure the integration of human rights considerations nationally and internationally across all of the company's operational and employment practices. In particular, to protect the rights of our employees across the company.

2. Scope

This policy applies to all individuals working for the company, including but not limited to permanent, fixed-term and/or temporary employees, contractors, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (herein collectively referred to as "employees" in this policy).

This policy applies to an employee's conduct during their working hours and, where appropriate, outside of working hours including online.

In this policy, third party means any individual or organisation that an employee comes into contact with during the course of work for the company, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Third parties are guests of the company and are expected to comply with this policy, save where inappropriate.

3. Legislation

Human rights are recognised rights that every human is entitled to enjoy and have protected.

In the UK, your human rights are enshrined in the Human Rights Act 1998 which incorporates the rights established under the European Convention on Human Rights. Monica Vinader complies with all applicable UK legislation and we also respect human rights enshrined in the UN Declaration of Human Rights and the International Labour Organisation's Declaration on Fundamental Principles and Rights to Work.

In the United States, your human rights are legally protected by the Constitution of the United States and its amendments as well as in state legislatures. In New York, your human rights are embodied in Title 8 of the Administrative Code of the City of New York and are protected by the New York City Commission on Human Rights

In Hong Kong, your human rights are protected by the Basic Law of the Hong Kong Special Administrative Region of the People's Republic of China and its Bill of Rights Ordinance (Cap.383) and the International Covenant on Civil and Political Rights (ICCPR).

This policy has been updated to align with the HM Government's Guidance from May 2016 on implementing the UN Guiding Principles on Business and Human Rights.

4. Our Company's Commitments

4.1 To provide a secure working environment free from unlawful discrimination and harassment.

4.2 To comply with all applicable recognised human rights and relevant applicable laws in countries where we operate our business.



- 4.3 To honour the principles of internationally recognised human rights when faced with conflicting requirements.
- 4.4 To treat human rights as a legal compliance issue.
- 4.5 To identify, prevent and mitigate possible human rights risks and commit to undertaking appropriate due diligence to evaluate and ensure implementation.
- 4.6 To consult with any employee or third party who may be affected, in a manner that ensures free and informed participation taking into account language and any other potential barriers to effective engagement.
- 4.7 To ensure compliance through all supply chains.
- 4.8 To provide a transparent, fair and equitable grievance procedure which can be used for the remediation of any adverse human rights issues.
- 4.9 To be transparent about policies, activities and impacts, and report on human rights risks and issues where necessary.

5. The fundamental principles of this policy

5.1 Respect for Human Rights

Monica Vinader respects and protects recognised human rights of our employees and those connected with our business activities.

5.2 Valuing Diversity

Monica Vinader values the diversity of all employees and is committed to protecting our employees' right to work in an environment where the working conditions and practices will not infringe on the employee's physical, sexual, racial, religious and psychological rights; and will be free from any other form of harassment, threat or abuse.

5.3 Freedom of Association

Employees will be free to form associations for the protection of their interests and to bargain collectively without fear of reprisal, intimidation or harassment.

5.4 Safe, secure and healthy workplace

Monica Vinader is committed to providing a safe, secure and healthy workplace.

5.5 Forced labour and human trafficking

Monica Vinader prohibits any form of forced labour and human trafficking.

5.6 Child labour

Monica Vinader will not employ children under the age of 16 years old, however they may be offered the opportunity for work experience with the company under strict supervision.

No employee under the age of 18 will be:

- tasked with work that they are physically and/or mentally capable of doing;

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- tasked with work which brings them into contact with chemical agents, toxic materials or any situation that can be classed as hazardous to their health including radiation; and
- tasked with work which involves a health risk because of extreme cold, heat or vibration.

Monica Vinader will request proof of identify from all employees upon recruitment to establish the age of any employee ahead of their employment commencing.

The company's prohibition of child labour is consistent with International Labour Organization standards.

5.7 Work hours, wages and benefits

Monica Vinader operates in full compliance of laws applicable to wage, work hours and benefits.

All employees will earn equal pay for equal level and value of work.

5.8 Non Discrimination

Monica Vinader is an equal opportunities employer.

All employees are treated equally and there will be no discrimination based on age, race, gender, political opinion, social origin, marital status, disability, sexual orientation, religious belief or lack of belief ("Protected Characteristic") and any other characteristic protected by law.

Discrimination occurs where a person is treated unfairly because of one, or more, of the Protected Characteristics. Discrimination can take many forms including but not limited to direct or indirect discrimination, both of which are unlawful.

All employees have a personal responsibility to behave in a non-discriminatory manner at all times, including when outside of the workplace. The company will take action against any employee who brings the company's reputation into disrepute.

Any allegation of discrimination will be treated as serious and investigated in accordance with the Disciplinary Policy.

5.9 Recruitment of Ex-Offenders (UK)

In the UK, the code of practice published under section 22 of the Police Act 1997 advises businesses on the recruitment of individuals who have a criminal record.

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), Monica Vinader Limited complies fully with the code of practice and undertakes to treat all applicants for positions fairly

Monica Vinader Limited undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

Monica Vinader Limited can only ask an individual to provide details of convictions and cautions that Monica Vinader Limited are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).

Monica Vinader Limited can only ask an individual about convictions and cautions that are not protected.

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Monica Vinader Limited is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

Monica Vinader Limited has a written policy on the recruitment of ex-offenders, which can be made available on request to all applicants at any point in the recruitment process.

Monica Vinader Limited actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. Monica Vinader Limited select all candidates for interview based on their skills, qualifications and experience.

An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position

Monica Vinader Limited ensures that all those in Monica Vinader Limited who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.

Monica Vinader Limited also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974.

At interview, or in a separate discussion, Monica Vinader Limited ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment

Monica Vinader Limited makes every subject of a criminal record check submitted to DBS aware of the existence of the code of practice and makes a copy available on request.

Monica Vinader Limited undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

5.10 Harassment

Harassment is unwanted conduct of a sexual nature, or other conduct related to one or more Protected Characteristics, which has the purpose or effect of violating the dignity of individuals at work creating an intimidating, hostile, degrading, humiliating or offensive working environment. Harassment can take many forms including but not limited to verbal, non-verbal or physical.

Monica Vinader is committed to providing a secure working environment free from harassment, where the dignity of individuals is respected.

All employees have a personal responsibility to behave in an appropriate manner at all times, including when outside of the workplace. The company will take action against any employee who brings the company's reputation into disrepute.

Any allegation of harassment will be treated as serious and investigated in accordance with the Disciplinary Policy.



6. How to raise a concern

We wish to encourage open and honest communications amongst all employees.

If employees are aware of or become aware of a human rights risk or issue they must immediately report this to their manager or the HR Team.

All employees will be free to lodge complaints, including any cases of unfair discrimination through our grievance procedure. We encourage all employees to resolve any dispute(s) informally and at an early stage without resorting to the formal procedure, but we recognise that in some cases an informal approach fails to address the issue or the subject matter maybe too sensitive.

We are committed to conducting our business with honest and integrity and we expect all employees to maintain high standards. Where an employee suspects any wrongdoing this should be reported as soon as possible to a member of the HR Team. Our company whistleblowing procedure can be found in our Grievance Policy.

7. Monica Vinader Tolerance Standard

If Monica Vinader becomes aware of any violations of this policy by a supplier or any business partner, the business relationship will be terminated immediately. If we have reason to believe the supplier or business partner, was aware of the violation and willingly operated in violation of fundamental human rights, the supplier or business partner will be reported to the proper authorities.

8. Responsibilities

Employees: to respect human rights and to immediately report any human rights risk or issue they are aware of to their manager or the HR Team.

Managers: to respect human rights and to immediately report any human rights risk or issue they are aware of to the senior management team or the HR Team.

Senior management: to ensure all processes are in place to monitor adherence to this policy including assessing actual and potential human rights impacts, integrating and acting upon the findings, tracking responses and communicating how impacts are address. To respond to any human rights issues raised.

9. Notice

The company reserves the right to amend this policy at any time. This policy does not form a part of any employees' contract.

10. Any Questions

If you have any questions in relation to this policy please contact a member of the HR Team.