



WORKING TOGETHER TO COMBAT ANTI-SLAVERY AND HUMAN TRAFFICKING SUPPLIER CODE OF CONDUCT

1. INTRODUCTION

- 1.1 The Deltic Group ("Deltic") are committed to ethical and human rights principles. We are committed to working with suppliers who are equally taking active steps to combat slavery and human trafficking.
- 1.2 We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or any part of our business. This Supplier Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships. This Supplier Code of Conduct will be reviewed on a regular basis.
- 1.3 This Supplier Code of Conduct is a minimum standard. Deltic expect all Suppliers to comply with applicable local and international laws, regulations and industry standards. Where standards differ, the standard which offers the greater degree of protection for Workers must be adopted.
- 1.4 Suppliers must ensure that all sub-contractors and companies who supply goods and services to them are provided with a copy of the Supplier Code of Conduct and confirm in writing to the Supplier that they comply with it. Records of this confirmation must be kept and made available to Deltic on request.
- 1.5 Suppliers must ensure that it takes all reasonable steps to communicate this Supplier Code of Conduct to all relevant employees.
- 1.6 We recognise that local socio-economic and cultural factors are relevant to the implementation of the Supplier Code of Conduct. Where such factors exist Suppliers must work closely with us and any other organisations we chose to involve to move as quickly as possible to full compliance.

2. DEFINITION OF A SUPPLIER AND WORKER

- 2.1 The term Supplier includes any business partner except for Deltic's customers and any exempt suppliers as set out below. This includes, but is not limited to, Suppliers from whom Deltic purchases services and products such as drinks wholesalers, brand owners, consumable wholesalers and manufacturers, marketing consumable manufacturers, uniform manufacturers, cleaners, temporary staff recruitment agencies, security companies, food suppliers and manufacturers.

- 2.2 Exempt suppliers include Government Agencies and Offices (such as fees, taxes, charges, permits, licences etc) and utility providers (such as phone, network, electricity, gas etc).
- 2.3 These examples are not exhaustive but are typical of the business partners who fall within the scope of this Supplier Code of Conduct.
- 2.4 For the purpose of this Supplier Code of Conduct the word Worker means any employee or worker of a Supplier.

3. LAWS AND REGULATIONS

- 3.1 Suppliers will comply with all applicable local and national laws, rules, regulations and requirements in the manufacturing and distribution of the products and services which we purchase.

4. FAIR WAGES

- 4.1 Wages paid to Workers must be at minimum, national legal standards or industry benchmark whichever is higher. Wages must always be enough to meet basic needs and to provide some discretionary income.
- 4.2 Suppliers must not make any unlawful deductions from wages, especially from those who resign from their employment.

5. WORKING HOURS AND ANNUAL LEAVE

- 5.1 Working hours must comply with national laws and industry standards.
- 5.2 Suppliers will keep a clear and reliable record of the hours that Workers work and the wages and benefits that they receive and make those available to Deltic on request.
- 5.3 Workers must be able to refuse overtime without any disciplinary action being taken against them.

6. CHILD LABOUR

- 6.1 Deltic do not tolerate any form of child labour. No person younger than 15 (or 14 in certain developing countries as designated by ILO conventions) shall be employed except on a seasonal or part-time basis.
- 6.2 Suppliers must maintain formal documentation that verifies the age of each Worker.
- 6.3 Suppliers must comply with all relevant child labour laws.
- 6.4 Young persons under the age of 18 must not be employed at night or in hazardous conditions.

7. FORCED, BONDED, COMPULSORY LABOUR OR SERVITUDE OR ANY FORM OF HUMAN TRAFFICKING

- 7.1 Suppliers must not use any forced, bonded, compulsory labour or any Worker in servitude or who has been subjected to human trafficking.

- 7.2 Suppliers will not charge Workers fees or demand deposits from them in order to restrict or to prevent the Worker from leaving their employment (examples include recruitment or travel fees and deposits for uniforms or tools)
- 7.3 Unless required for security reasons or local law, Suppliers must not keep the originals of any identification provided by Workers. Where identification is retained, Suppliers must ensure that the Worker has free access to the identification.
- 7.4 Suppliers must allow the free movement of Workers. No rules or policies should be in place which restrict such movement, for example gates must not be locked to prevent Workers from leaving the premises.

8. ABUSE OF WORKERS

- 8.1 Suppliers will comply with all applicable local and national laws on abuse of Workers and will not physically abuse Workers. Sexual harassment and any form of intimidation will not be tolerated.
- 8.2 Suppliers will ensure that disciplinary action is fair, proportionate and fully compliant with local laws. Suppliers will keep adequate records of all disciplinary action taken and make them available to Deltic on request.
- 8.3 Suppliers will develop whistleblowing and grievance policies and processes for its workers.

9. WORKING CONDITIONS

- 9.1 Suppliers must ensure a secure, safe and healthy working environment for Workers and, where accommodation is provided, for Workers to live. Suppliers will have policies in place and implement such policies to prevent accidents, injuries and exposure to health risks.
- 9.2 Suppliers must keep adequate records in relation to accidents and injuries which occur and ensure that any remedial action necessary is taken.
- 9.3 Suppliers shall comply with all applicable local and national health and safety laws.

10. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

- 10.1 Suppliers must respect Workers' rights to join, form or not to join a trade or labour union without fear of reprisal, intimidation or harassment. Where Workers are represented by a legally recognised union, they will establish a constructive dialogue with freely chosen representatives.
- 10.2 Suppliers will comply with all applicable local and national laws on freedom of association and collective bargaining.

11. DISCRIMINATION

- 11.1 Suppliers will fully comply with local laws regarding equality of employment opportunities.

11.2 Subject only to local law, Suppliers will practise no discrimination in recruitment, remuneration, benefits, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion or belief, age, disability, gender, pregnancy or maternity, marital status, sexual orientation, union membership or political affiliation.

12. MONITORING

12.1 Suppliers agree to permit and assist Deltic representatives (including third party auditors) to access Supplier documentation, management systems and Workers to assess compliance and progress against this Supplier Code of Conduct.