



FSC® Core Labour Requirements POLICY STATEMENT

Version 1

Date: 05.09. 2022

POLICY STATEMENT - Compliance with FSC® Core Labour Requirements

Brightsea Print Group is committed to complying with the FSC® core labour standards, as published in FSC-STD-40-004-V3-1 under point 7.

At Brightsea Print Group, compliance with these laws is additionally prescribed by internal guidelines (e.g. Policies and Code of Conduct). We control compliance with the requirements through internal (employee interviews, staff meetings, internal audits or internal communication) and external examinations (company audits, wage tax audits, external audits).

The core labour standards, as they have been declared by the FSC®, are not only the basis of our work from a legal point of view. For us, from an ethical and moral point of view, they represent the minimum requirements for work.

Core Labour Requirements Policy

Statement of Intent

We demonstrate the highest level of ethical principles ourselves. We are fair in our procurement dealings and avoid any adverse conduct.

It is the responsibility of all our employees, to maintain and exhibit faultless standards of integrity in all aspects of our business, both internally and externally, and firmly to reject those practices that may reasonably be deemed improper; ensuring that we are trusted and respected and that we are known for carrying out business efficiently in a fair and reasonable manner, and with integrity.

Aim

We are committed to ensuring our services are delivered, used and disposed of in an ethical manner.

Objectives

To encourage and promote ethical behaviour among our business and ensure this is supported by appropriate systems and procedures.

Working conditions

- *Freedom of Association and Collective Bargaining* — As far as any relevant laws allow, all employees are free to form or join a union, which pertains to the protection of the terms conditions of the employment of employees, such as wages, hours of work, working conditions and grievance procedures. The working conditions have to facilitate:
 - that all employees without distinction have the right to join or form trade unions of their own choosing
 - employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- *Elimination of All Forms of Forced and Compulsory Labour* — Forced, bonded or compulsory labour is not used and employees are free to leave their employment after reasonable notice. Employees are not required to lodge deposits of money or identity papers with their employer.
- *Elimination of Discrimination in Respect of Employment and Occupation* — A policy of equality for all is in place and there is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, weight, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.
 - *Abolition of Child Labour* — Work undertaken by people of 16 years or under without consideration for their personal development, safety, education or health is prohibited. We support the long-term elimination of child labour (this is taking place in a manner consistent with the best interests of the children concerned). We develop or participate in and contribute to policies and programmes that provide for the transition of any child found to be performing child labour to enable them to attend and remain in quality education until no longer a child. Furthermore, we enforces the point that children and young persons under the age of 18 are not being employed at night or in hazardous conditions.

Right to a living wage

We ensure that we treat our employees ethically. Wages paid for a standard working week need to meet or exceed national (or, where applicable, local) legal standards.

In addition, all workers are provided with written information about their employment conditions in respect to wages before they enter employment.

Deductions from wages as a disciplinary measure is not be permitted.

Avoidance of excessive working hours

- Standard working hours must comply with national laws and national benchmark industry standards; whichever affords greater protection to the employee.
- All employees are not, on a regular basis, required to work in excess of 48 hours per week and will be provided with at least one day off for every seven-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

Safe and healthy working conditions

We provide a safe and health working environment, with an awareness of any specific hazards. We take steps to ensure that appropriate and sufficient health and safety training is carried out and the correct practices put in place in order to minimise risk. Suitable welfare facilities are provided to the employees; these include toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.

Environment

We have and manage our BS8555 environment management certification.

We have processes in place to actively improve the efficiency within the factory and processes used and the release of harmful emissions to the environment associated with manufacture, use and end-of-life product management are minimised. We also have an effective environmental policy in place and to implement the policy at all levels throughout the company and to include a commitment to continual improvement in environmental performance, the prevention of pollution and encouraging sustainability is expected.

We also:

- comply with all environmental legislation, regulations and all local laws which relate to the organisation's environmental aspects to facilitate the protection of the environment
- have a process that ensures conformity to local regulations, including those relating to the reduction, reuse and recycling of waste and the elimination and safe disposal of dangerous materials
- identify a person within the organisation who has responsibility for environmental compliance issues and continual improvement within environmental management.

Our Working Principles

- We will ensure the most ethical outcomes are achieved.
- Appropriate ethical, environmental and social requirements will be integrated into all business activities.
- We will review the ethical, environmental and social impacts of a particular product or service over its whole-life cycle..
- We will ensure that all relevant people are provided with appropriate training and guidelines to implement the requirements of this standard.

Our Accountability

- All our business premises and relevant members of staff have a shared responsibility for integrating the provisions of this policy.
- We will review this policy and associated procedures on an annual basis.
- We will use external assessors BPIF to verify our performance a regular basis.
- We will monitor and report, where appropriate, the ethical, environmental and social outcomes achieved and will monitor external trends in these areas that we will need to respond to.

Signed on the 6th September 2022 on behalf of Brightsea Print Group.



Mark Commins

Managing Director