

BROOK TAVERNER

SINCE 1912

ETHICAL POLICY

Version	3
Reviewed by	Kristian Lee – Compliance and Sustainability Manager
Approved by	Ben Foster – Operations Director
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Changes from version 2	• Transposed into new document format • Minor grammatical and wording changes to aid clarity • Audit grading section added • Critical non-compliances section added • Supplier declaration added

BACKGROUND

At Brook Taverner, we pride ourselves on our relationships with our suppliers and customers, in order to ensure we are acting in the best interests of both parties we have created an Ethical Policy.

We understand the importance of transparency in our supply chain and as such we have mapped our tier 1 production sites, ensuring that all sites have a current ethical trade audit, we also actively work with our suppliers to close down any non-compliances.

We are committed to running a business that prioritises the wellbeing of the people within its supply chain and as such we aim to protect all workers from modern slavery and human trafficking.

ACCEPTABLE AUDIT FORMATS

Our preferred audit formats are summarized below; however, we will accept other widely used ethical trade audits as long as they are conducted by a reputable third-party audit provider:

- SEDEX members Ethical Trade Audit (SMETA)
- Business Social Compliance Initiative (BSCI)
- SA 8000

Production sites may already have an ethical trade audit in place, to help avoid unnecessary expense and 'audit fatigue' alternative, reputable audit schemes with an up-to-date Corrective Action Plan (CAP) will be accepted.

AUDIT GRADING

Ethical trade audits will be graded by Brook Taverner and assigned a red, amber or green grade depending on the criticality of any non-compliances present at the time of audit.

- To incentivise best practice, we will consider extending the audit validity period for any sites with 2 consecutive green gradings
- Sites receiving 2 consecutive amber gradings will be downgraded to red if there is no evidence of improvement
- Sites receiving a red grading will be escalated to the Director team
- Sites receiving 2 consecutive red gradings will be escalated to the Director team and with the recommendation that we cease the business relationship with the site

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CRITICAL NON-COMPLIANCES

The NCs (non-compliances) in the table below are not acceptable to Brook Taverner and have therefore been classified as critical.

Where critical NCs are identified during a visit or a 3rd party ethical trade audit, the supplier will be expected to work with the production site to quickly and effectively remediate the NCs.

A partial semi-announced or unannounced follow up audit must then be conducted within 90 days of the original audit to show effective closure of the critical NCs.

Section	Non-compliance
Child Labour	Age - Under 16 years
Child Labour	Age - Un-remediated child labour
Discrimination	Body searches - Unreasonable personal body searches
Discrimination	Bribes - Supervisors or managers taking bribes including sexual favours
Discrimination	Discrimination - Dismissal of pregnant workers
Discrimination	Discrimination - Dismissal of workers during maternity leave
Discrimination	Dismissal - Unfair dismissal or abuse of vulnerable workers: cover pregnant workers, migrant workers, homeworkers / members of trade unions
Discrimination	Harassment - Any physical punishment
Discrimination	Harassment - Sexual abuse or harassment
Employment freely chosen	Bonded labour - Retention by employer or employment agent of original identification papers and/or passports unless required by law
Employment freely chosen	Bonded labour - Workers are not able to resign from the site
Employment freely chosen	Bonded labour - Workers paying deposits when commence employment
Employment freely chosen	Breaks - Complete absence of toilet and rest breaks
Employment freely chosen	Involuntary - Work is not voluntary, for example, unpaid, overtime, bonded, forced or trafficked
Employment freely chosen	Leaving - Workers are not allowed to leave the facility when shifts end
Employment freely chosen	Prison - Any involuntary prison labour
Freedom Of Association	Union - Control of union by employer
Health & Safety	Certification - No applicable structural integrity certificate/inspection where it is observed there is an immediate risk of building and constructions for workers health and safety
Health & Safety	Fire - Emergency exit doors are not unlocked during working hours
Health & Safety	Fire - No fire alarm
Health & Safety	Fire - No firefighting equipment on site
Health & Safety	Fire - Restricted liberty in dormitories including unreasonable curfews/ dormitory rooms are locked from the outside at night
Health & Safety	Hazards - Production area and dormitory area together
Health & Safety	Hazards - Storage of hazardous materials in accommodation premises
Health & Safety	Structure - Buildings are not structurally safe
Health & Safety	Water - Clean drinking water not available
Management Systems and Code Implementation	Access - Access to site, dormitory, workers or documentation denied
Management Systems and Code Implementation	Transparency - Withholding true records, manipulation/ falsification of site records
Wages & benefits	Payment - Employees work without payment
Wages & benefits	Transparency - Management does not keep one complete and accurate payroll
Working Hours	Transparency - Evidence of deliberate falsification of wage and hours records (double books)
Working Hours	Transparency - No time records available for review

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CORRECTIVE ACTION PLANS

Suppliers are required to complete and commit to CAPs (Corrective Action Plans) for all red graded audits.

TRANSPARENCY AND UNAUTHORIZED SUBCONTRACTING

The need for transparency has never been more prevalent in our industry and we will only work with suppliers who support our efforts to fully understand our supply chain.

Prior to any manufacturing starting, a new production site has to be approved by the compliance and operations teams.

If we do not know where our product is being produced, we cannot fully monitor or risk assess our supply chain, workers within unauthorized production sites can be at an increased risk of exploitation and trafficking as the site may not have been subject to the same audits and due diligence checks.

We take unauthorized subcontracting extremely seriously; unauthorized subcontracting could result in the end of our working relationship.

ANTI - BRIBERY

At Brook Taverner any financial 'kick backs' in the form of facilitation of payments or bribes to anybody in our business, wider partnerships or organizations is forbidden and will result in us ceasing our business relationship with this supplier/production site, we see any offer of a bribe as being just as serious.

SUPPLY CHAIN AND PAYMENT

At Brook Taverner we strongly believe that nobody within our supply chain should ever pay a fee for employment, any costs associated with hiring must be paid by the employer not the worker.

SUPPLIER MINIMUM COMMITMENTS

- You will comply with the UK Bribery Act 2010, its territory-specific equivalents, and all legislation relating to your industry or sector
- Ensure personal data shall be managed in accordance with the specific legal obligations of The General Data Protection Regulation (EU) 2016/679 (GDPR), and any subsequent updates to the GDPR
- We will always act with honesty and integrity and we expect the same of our suppliers, production sites and their employees and colleagues
- If the subcontracting of any process is required, you will let Brook Taverner know as soon as is practically possible and you will provide appropriate production site details and documentation. It is at our discretion whether we approve this site or not
- Any information shared with you is to be treated as confidential and will not be shared with anybody outside of Brook Taverner, this includes all forms of communication, emails, face to face meetings, phone calls and product development
- The success of this policy relies on the direct engagement of our suppliers/production sites to ensure that ethical behaviour is upheld throughout our supply chain

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PLEASE GET IN TOUCH

We are here for you to contact should you be required to do so:

Compliance and Sustainability Manager: k.lee@brooktaverner.com

SUPPLIER DECLARATION

By signing below, we acknowledge that we have received, read and understood this policy and declare our commitment to uphold and integrate it into our operations, aligning with the values and expectations set forth by Brook Taverner Ltd.

Production site name:		Company stamp
Name:		
Job title:		
Email address:		
Date:		
Signature:		

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