

# Ethical Procurement

We expect our suppliers to comply with legal requirements and to adopt the following moral principles:

## Regulatory compliance

Suppliers shall comply with all national and other applicable law and regulations. Where the national law and this Standard are in conflict, the highest standards consistent with national law should be applied.

Where the provisions of law and this Standard are not in conflict but address the same subject, the provision, which affords the greatest protection to people and the environment, should be applied.

## Employment

- There is no forced, bonded or involuntary prison labour.
- All employees without distinction, have the right to join or form trade unions of their own choosing and, where a significant proportion of the workforce agree, to bargain collectively.
- Employees' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Elimination of child labour
- The long-term elimination of child labour should take place in a manner consistent with the best interests of the children concerned.
- Suppliers should 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 her or him to attend and remain in quality education until no longer a child.
- Children and young persons under 18 shall not be employed at night or in hazardous conditions.

## Right to a living wage

- Wages paid for a standard working week meet or exceed national (or, where applicable, local) legal standards.
- In any event, wages should not be paid in kind and should be enough to meet basic needs.
- All workers should be provided with written and comprehensible information about their employment conditions in respect to wages before they enter employment and the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure should not be permitted.  
Deductions from wages not provided for by national law should only be permitted

with the expressed permission (without duress) of the worker concerned. All disciplinary measures should be recorded.

## 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 should not on a regular basis be required to work in excess of 48 hours per week and should be provided with at least one day off for every 7-day period on average. Overtime requested by the employer must be voluntary and must not be requested on a regular basis.

## No discrimination

- A policy of equality for all should be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, religious beliefs, union membership or political affiliation.

## Provision of regular employment

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship should not be avoided.
- Examples include the abuse of labour-only contracting, sub-contracting, or home-working arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or the excessive use of fixed-term contracts of employment.

## No harsh or inhumane treatment

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse of other forms of intimidation shall be prohibited.
- Safe and Healthy Working Conditions

## We expect our suppliers:

- To provide a safe and healthy working environment bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards.
- To take adequate steps to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is

reasonably practicable, the causes of hazards inherent in the working practice and environment.

- Provide workers with suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise the risks.
- Provide suitable and adequate welfare facilities including toilet facilities, drinking water and food storage where required. Accommodation, where provided, shall be clean, safe and meet the needs of the workers.
- To assign responsibility for health and safety to a senior management representative.

## Environment

We expect our suppliers:

- To have an effective environmental policy, to implement the policy at all levels throughout the company and to include a commitment to continual improvement in environmental performance and prevention of pollution.
- To comply with all environmental legislation, regulations and all local laws which relate to the organisations environmental aspects to facilitate the protection of the environment.
- To 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.
- To identify a person within its business who has responsibility for environmental compliance issues and to be able to demonstrate that responsible personnel are adequately trained in environmental matters.
- To routinely identify risks of adverse environmental impact associated with their operations and where operations with identified risks are planned to ensure they are carried out under controlled conditions with the objective of minimising potential adverse impact upon the environment.

## Responsibility and Authority

This policy standard is issued under the authority of the Managing Director, Mentor Group. Responsibility for implementation of this policy standard is set out below.

### ***Responsibility for the achievement of this policy standard rests with the Directors***

- Directors are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their division and report to their divisional board.
- Staff are responsible for implementing the policy standard, monitoring its implementation in the everyday activities of their operations and report to their Team Leader or Director.
- The Operation's Director is responsible for reviewing the policy standard and ensuring that it is kept up to date with changes in legislation. It is also responsible for the

development of guidance and training on the implementation of the policy standard and for providing appropriate reports to the board.

## Evidence of Compliance

The Mentor Group Board will carry out regular monitoring of the implementation of sustainable procurement commitments and ethical standards by business units to enable us to identify trends and ensure that environmental and social factors are being considered in procurement decisions.



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Chris Norton  
Managing Director  
Mentor Group Ltd