



Policy Statement

Direct Packaging Ltd (DPL) recognizes that our commercial activities have potential to impact on our suppliers and our locality. As a socially responsible small business our suppliers, local community and customers have a right to expect:

- All workers involved in the delivery of services provided by DPL are treated with full consideration to their basic human rights.
- DPL acts in an ethical manner above and beyond basic legal requirements.
- DPL is committed to implementing the principles of the Ethical Trading Initiative Base Code.

Code of Practice

This Code of Practice applies to:

- Staff directly employed by DPL on temporary or permanent contracts.
- Staff employed or provided by contractors or employment agencies to work on DPL premises or to undertake work for or on behalf of DPL

Employment Is Freely Chosen

- No forced, bonded or involuntary labour shall be used.
- Staff are not required to lodge deposits or identity papers with us.
- Staff are free to leave DPL after reasonable notice.

Working Conditions Are Safe and Hygienic

- Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Staff receive health & safety information.
- Staff have access to toilet facilities and drinking water.
- DPL has a published Health & Safety Policy.

Child Labour Shall Not Be Used

- There shall be no recruitment of child labour.
- Children or persons under 16 are not employed at any time, day or night.
- Young persons under 18 shall not be employed at night or in hazardous conditions.

Remediation

If child labour is found in the supply chains of Direct Packaging Ltd, it will seek to work in partnership with the supplier and appropriately qualified organisations to develop a responsible solution that is in the best long-term interests of the children. The supplier and Direct Packaging Ltd will agree a corrective action plan, which may comprise the following actions:

- Collate a list of all potential child labourers and young workers
- Seek advice and help from a recognised local non-governmental organisation that deals with child labour or the welfare of children^[1]
- Develop a remediation plan that secures the children's education and protects their economic well-being, in consultation with Direct Packaging Ltd and where possible a local NGO, and in consultation with and respecting the views of the child
- Explain the legal requirements and restrictions on working ages to the children and assure them that, if they wish, they will be employed when they reach working age
- Understand the children's desires and explore the opportunities for them to re-enter education.
- Whether the child contributes to the livelihoods of their family or they are self-dependent, his or her wage should continue be paid until they reach working age, or until an alternative long-term solution has been agreed with the child and their family (for example employment of an unemployed adult family member in place of the child labourer).

- Ensure that the child worker has adequate accommodation and living conditions.
- Document all actions
- Develop processes to prevent recurrence
- Do not:
 - o Expel any of the suspected or confirmed child labourers and/or young workers
 - o Threaten the children or their families or hamper the progress of investigation and remediation
 - o Conceal or falsify any documentation

Such actions will be considered by Direct Packaging Ltd as evidence that the supplier is not committed to child labour remediation, in breach of this Child Labour Policy.

Living Wages Are Paid

- Staff pay rates are equal to or above the national legal minimum standards.
- Staff are given information about their employment conditions in respect to wages
- No deductions are made from wages as a disciplinary measure, and pay slips detailing lawful deductions are provided for each pay period.
- Staff are given clearly understandable written terms and conditions of employment that details the employment relationship and the respective obligations of the employee and employer.

Working Hours Are Not Excessive

- Staff are not forced to work in excess of 48 hours per week, a voluntary opt out agreement is available for those wishing to work in excess of 48 hours per week.

No Discrimination Is Practised

- There is no discrimination in pay, hiring, compensation, access to training, promotion, and termination of employment or retirement on the grounds of race, nationality, religion, age, disability, marital status, sexual orientation, union membership or political affiliation.
- Opportunities for personal and career development are equally available to all employees.

No Harsh Or Inhumane Treatment Is Allowed

- Physical, verbal and sexual threats, abuse, harassment or intimidation is expressly prohibited and grounds for summary dismissal, if proved.