



SUPPLIER CODE OF CONDUCT AND ETHICAL TRADING POLICY

Inc ANTI-SLAVERY & HUMAN TRAFFICKING POLICY

Introduction

As a leading spring water manufacturer, Harrogate Water Brands is committed to sourcing the highest quality components from a number of recognised suppliers. We believe that these standards of conduct are fundamental in the procurement of all of our products and services.

All suppliers of products and services to Harrogate Water Brands will do so in accordance with this Code of Conduct. For these purposes "Suppliers" include any contractors and suppliers of both goods and services.

Where suppliers breach this Code of Conduct we will work with them to improve business standards and employee welfare, **ensuring compliance with Anti-Slavery and Human Trafficking legislation**. However, we reserve the right to terminate our arrangement with that Supplier immediately if there is no apparent willingness to make the necessary changes.

This Code of Conduct is a requirement of working with Harrogate Water Brands, and as such may be subject to an audit. Harrogate Water Brands expects its suppliers to work with them in an open style and co-operate with any auditors that may be employed.

1. EMPLOYMENT IS FREELY CHOSEN

- 1.1 There is no forced, bonded or involuntary prison labour.
- 1.2 Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employer after reasonable notice.

2. FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING ARE RESPECTED

- 2.1 Workers, have the right to join or form trade unions of their own choosing and to bargain collectively.
- 2.2 The employer adopts an open attitude towards the activities of trade unions and their organisational activities.
- 2.3 Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace. Such representative functions should include a workers committee with elected members where workers can confidentially raise concerns they may have with regard to these Guidelines
- 2.4 Where the right to freedom of association and collective bargaining is restricted under law, the employer facilitates, and does not hinder the development of parallel means for independent and free association and bargaining.

3. WORKING CONDITIONS ARE SAFE AND HYGIENIC

- 3.1 A safe and hygienic working environment shall be provided. Action should be taken to prevent accidents and injury to health, associated with, or occurring in the course of work, by minimizing the causes of hazards within the working environment.
- 3.2 Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.3 Access to clean toilet facilities and to water, and, if appropriate, sanitary facilities for food storage shall be provided.
- 3.4 The company observing the code shall assign responsibility for health and safety to a senior management representative.

4. ENVIRONMENTAL REQUIREMENTS

- 4.1 Harrogate Water Brands expects its suppliers to share their commitment to the environment and demonstrate that their practices conform to the applicable environmental standards.
- 4.2 It is the responsibility of the supplier to inform Harrogate Water Brands of any amendments to their environmental policy.

5. CHILD LABOUR SHALL NOT BE USED

(Child labour defined - Any work by a child or young person younger than the age(s) specified in the above definitions, which does not comply with the provisions of the relevant ILO (International Labour Organization) standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education or to be harmful to the child's or young person's health or physical, mental, spiritual, moral or social development.

A Child is defined Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age shall apply. If however, local minimum age law is set at 14 years of age in accordance with developing country exceptions under ILO(International Labour Organization)Convention No. 138, the lower will apply

A Young person is defined as any worker over the age of a child as defined above and under the age of 18

- 5.1 There shall be no recruitment of child labour.
- 5.2 Companies shall develop or participate in and contribute to policies and programmes which 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.
- 5.3 Children and young persons under 18 shall not be employed at night or in hazardous conditions.
- 5.4 These policies and procedures shall conform to the relevant ILO (International Labour Organization) standards.

6. ANTI-SLAVERY & HUMAN TRAFFICKING

Modern slavery is a crime and a violation of fundamental human rights. The various forms include: slavery, servitude, forced and compulsory labour and human trafficking; all of which have in common the removal of a person's liberty by another person, exploiting them for personal or commercial gain.

Harrogate Water Brands operates a zero tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in within our business or supply chains.

Harrogate Water Brands employ a transparent approach to tackling modern slavery and throughout our supply chains being consistent with our disclosure obligations under the Modern Slavery Act 2015. Similar high standards of application are expected from our contractors, suppliers and business partners. Our policy applies to all employees and any person working for us at all levels including but not restricted to: Directors, contractors/consultants, agency workers, volunteers, work placements, apprentices and business partners and third party representatives.

- 6.1 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our

control. Suppliers are required to avoid any activity that might lead to or suggest a breach of this policy.

- 6.2 You must notify your manager or the Technical Team as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 6.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 6.4 If you are unsure whether a particular act, the treatment of workers or their conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it immediately with your manager and/or the Technical Team.
- 6.5 Harrogate Water Brands aims to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if the concerns turn out to be unfounded. We are committed to ensuring that no one suffers any form of detrimental treatment as a result of reporting in good faith their suspicions that any form of modern slavery may be taking place in any part of our own business or any of our supply chains.

Detrimental treatment includes: dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, please inform the Technical Team immediately. If the matter is not sufficiently resolved and you are a Harrogate Water Brands employee you should raise it formally using the Grievance Procedure.

7. WORKING HOURS ARE NOT EXCESSIVE

- 7.1 Working hours comply with national laws.
- 7.2 Workers shall not be required to work in excess of 48 hours per week and shall be provided with at least one day off for every 7 days period on average.

Overtime must be on a voluntary basis, shall not exceed 12 hours a week, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

8. LIVING WAGES ARE PAID

- 8.1 Wages and benefits paid for a standard working week meet, at a minimum, national and local legal standards.
- 8.2 All workers shall be provided with written and understandable Information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- 8.3 Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the express permission of the worker concerned. All disciplinary measures should be recorded.

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- Overtime must be on a voluntary basis, shall not exceed 12 hours a week, shall
- 9.3 not be demanded on a regular basis and shall always be compensated at a premium rate.

10. NO DISCRIMINATION IS PRACTISED

- 10.1 There is 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, union membership or political affiliation.

11. REGULAR EMPLOYMENT IS PROVIDED

- 11.1 To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- 11.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

12. NO HARSH OR INHUMANE TREATMENT IS ALLOWED

12.1 Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall not be tolerated.

13. LEGAL REQUIREMENTS

13.1 Harrogate Water Brands is committed to full compliance with the laws and regulations where Harrogate Water Brands business is conducted.

13.2 Harrogate Water Brands will not knowingly use suppliers who violate applicable laws and regulations.