

Lion Safety Ltd Management System



Document Title: Ethical Trading Policy
Responsibility: Supply Chain Manager

Scope

This policy applies to the Integrated Management System (IMS) operated by Lion Safety Ltd. This policy sets out how Lion Safety Ltd seeks to purchase goods from its suppliers; considerations from this policy will form part of the evaluation and selection criteria for all goods and services purchased by Lion Safety Ltd.

Responsibility

It is the responsibility of the Management team to ensure that this policy is reviewed regularly and updated when necessary, and is the responsibility of the Supply Chain Manager to ensure that it is adhered to in all dealings with suppliers.

Document History

Issue	Date	Details of amendment / change	Responsibility
1	03/10/16	Creation	Daryl Michel
2	03/05/17	Refined responsibilities	Daryl Michel
3	12/06/19	Rebrand Header & Footer	Daryl Michel
4	10/12/20	Reviewed and rationalised with Modern Slavery Policy.	QE Advisor
5	05/07/21	Amended letterhead. New address. Reviewed	Roger Lewis



Ethical Procurement Policy

Lion Safety Ltd aims to promote good labour and environmental standards in the supply chains and to protect the reputation of the company. Lion Safety Ltd sources products from supply chain partners across the globe, some of which operating in areas where modern slavery has been identified. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Lion Safety Ltd has a zero-tolerance approach to any form of modern slavery and is committed acting ethically and with integrity and transparency in all business dealings. Lion Safety Ltd aims to put in place controls to safeguard against any form of modern slavery taking place within the business or our supply chain.

Labour Standards

Lion Safety Ltd are committed to encouraging diversity among our workforce and eliminating unlawful discrimination. We meet the standards listed in the Ethical Trading Initiative (ETI) Base Code which is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of good labour practice. We expect our supply chain partners to demonstrate similar policies and at a minimum guarantee their workers the following rights:

- Employment is freely chosen:
 - There is no forced, bonded or involuntary prison labour.
 - Workers are not required to lodge 'deposits' or their identity papers with the employer and are free to leave their employer after reasonable notice.
- Working conditions are safe and hygienic:
 - A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
 - 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 minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
 - Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
 - Access to clean toilet facilities and potable water, and, if appropriate, sanitary facilities for food storage shall be provided.
 - Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
 - The company observing the standards shall assign responsibility for health and safety to a senior management representative.
- Child Labour shall not be used
 - There shall be no new recruitment of child labour.
 - 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/him to attend and remain in quality education until no longer a child.
 - Children and young people under 18 years of age shall not be employed at night or in hazardous conditions.
 - These policies and procedures shall conform to the provisions of the relevant ILO standards.
- Living wages are paid
 - Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmarks, whichever is higher. In any event, wages should always be high enough to meet basic needs and to provide some discretionary income.



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- 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.
- 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 and informed permission of the worker concerned. All disciplinary measures should be recorded.
- Working hours are not excessive
 - Working hours comply with national laws and benchmark industry standards, whichever affords greater protection.
- No discrimination is practised
 - 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.
- Regular employment is provided
 - To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.
- No harsh or inhumane treatment is allowed
 - Physical abuse or discipline, the threat of physical abuse and verbal abuse or other forms of intimidation shall be prohibited.

Lion Safety Ltd operate a number of internal policies to ensure we that we are conducting business in an ethical and transparent manner. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will. We also have an Anti-bribery & Anti-Corruption Policy which outlines clearly and succinctly what bribery and corruption mean and steps any member of staff can take to prevent such instances occurring. We also operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Environmental Standards

Suppliers should as a minimum comply with all statutory and other legal requirements relating to the environmental impacts of their business. Detailed performance standards are a matter for suppliers, but should address at least the following:

- Waste management
 - Waste is minimised and items recycled whenever this is practicable. Effective controls of waste in respect of ground, air, and water pollution are adopted. In the case of hazardous materials, emergency response plans are in place.
- Packaging and paper
 - Undue and unnecessary use of materials is avoided, and recycled materials used whenever appropriate.
- Conservation



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- Processes and activities are monitored and modified as necessary to ensure conservation of scarce resources, including water, flora and fauna and productive land in certain situations.
- Energy use
 - All production and delivery processes, including the use of heating, ventilation, lighting, IT systems and transportation, are based on the need to maximise efficient energy use and to minimise harmful emissions.

Code of Conduct for Suppliers

Lion Safety Ltd expects its suppliers to meet the standards within this policy and to commit to continuous improvement towards compliance with the labour and environmental standards specified, both in their own companies and those of their suppliers. We operate a vendor rating system and conduct due diligence on preferred suppliers.

This policy is communicated to suppliers and personnel working on behalf of the company and is available for review by any interested party upon request.

A handwritten signature in black ink, appearing to be 'R. Lewis'.

Managing Director

June 2021